

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

NATIONAL FAIR	*	
HOUSING ALLIANCE, <i>et al.</i> ,	*	
	*	
Plaintiffs,		
v.	*	Civil Action No. CCB-18-1919
BANK OF AMERICA, N.A., <i>et</i>	*	
<i>al.</i> ,	*	
	*	
Defendants.		

* * * * *

DECLARATION OF LINDSAY AUGUSTINE

I, Lindsay K. Augustine, am over the age of 18 years and competent to testify as to the matters set forth in this Declaration. All statements herein are based on my personal knowledge.

1. I am currently the Senior Associate Director of Enforcement for the National Fair Housing Alliance (“NFHA”).
2. In 2009, NFHA began hearing from fair housing and real estate professionals, property and preservation vendors, and the National Association of Real Estate Brokers about their concerns that banks were failing to maintain and market real-estate-owned properties (“REOs”) in communities of color in the same manner they were maintaining and marketing REOs in majority-white communities. As a result of those concerns, NFHA developed a large-scale investigation to determine whether the racial makeup of a neighborhood had an impact on the quality of Bank of America’s maintenance and marketing of REO properties. In or around August 2012, through a press release, NFHA became aware that Safeguard, LLC had taken over Bank of America’s REO property maintenance and was now operating as their primary vendor nationwide.

3. To select the locations in which to investigate the marketing and maintenance of REOs, we relied on RealtyTrac to identify metropolitan areas with high foreclosure rates as compared to the rest of the state and the national average—this ensured that we were investigating communities that were affected by the foreclosure crisis and were most likely to have a high number of REOs to evaluate.

4. Next, we evaluated the concentrations of Black, Latino, and white communities in the identified metropolitan areas using the Brown University Dissimilarity Index¹ and data from the 2010 U.S. Census, and then by mapping that data with ArcGIS—a geographic information system mapping software. Identifying highly-segregated areas was necessary to assess whether or not discrimination was occurring based on the racial demographics of the neighborhood.

5. As a last step in determining which metropolitan areas to investigate, NFHA took into consideration whether the local fair housing organization had resources to support the investigation, or, in the alternative, if NFHA had the resources to investigate the area ourselves. NFHA staff and the staff of local fair housing organizations would serve as the property evaluators in this investigation.

6. Based on the above criteria, we investigated 37 metropolitan areas for the Bank of America investigation: (1) Atlanta, GA; (2) Baltimore, MD; (3) Baton Rouge, LA; (4) Birmingham, AL; (5) Chicago, IL; (6) Cleveland, OH; (7) Columbus, OH; (8) Dallas, TX; (9) Dayton, OH; (10) Denver, CO; (11) Suburban Detroit, MI; (12) Fort Worth, TX; (13) Gary, IN; (14) Grand Rapids, MI; (15) Greater Palm Beaches, FL; (16) Hartford, CT; (17) Indianapolis, IN; (18) Kansas City, MO/KS; (19) Louisville, KY; (20) Memphis, TN; (21) Miami / Fort Lauderdale, FL; (22) Milwaukee, WI; (23) Minneapolis, MN; (24) Muskegon, MI (25) New

¹ <https://s4.ad.brown.edu/projects/diversity/segregation2010/Default.aspx>.

Haven, CT; (26) New Orleans, LA; (27) Newark, NJ; (28) Orlando, FL; (29) Philadelphia, PA; (30) Providence, RI; (31) Richmond and Oakland, CA; (32) San Antonio, TX; (33) Tampa, FL; (34) Toledo, OH; (35) Vallejo, CA; (36) Washington, DC and Prince George's County, MD; and (37) Waterbury, CT.

7. Once the metro areas were identified, NFHA next selected the neighborhoods within each metro area to investigate. We first identified zip codes within the metro areas that were both racially concentrated and had a high foreclosure rate—for the reasons described above.

8. To do this, we downloaded 2010 U.S. Census racial demographic data from <https://data.census.gov/> for all zip codes in each of the metro areas we selected. Using that data, we overlaid zip code boundaries to determine whether a zip code was predominantly white or predominantly non-white, using the cut-off of 50.1%.

9. Out of those zip codes, we used RealtyTrac.com to identify the zip codes² within the metro areas with the highest rate of foreclosure as compared to the relevant county and state foreclosure rates and the foreclosure rate in the United States as a whole.³

10. From that subset, we then looked at Census data for the homeownership rates and median income of relevant zip codes to identify neighborhoods that qualify as working- or middle-class. We typically aimed to identify zip codes with at least a 40% rate of owner-occupancy, but in most zip codes the rate was much higher. We determined whether a zip code was working- or middle-class by comparing the median income in the zip code to the median

² Zip codes are the smallest levels of geography for which foreclosure data and REO listings are available through RealtyTrac.com—the most up-to-date, readily accessible, and reliable source of foreclosure data.

³ Foreclosure rates vary by state, and by county within each state, and rates could change monthly, so no one cut-off rate was applied across MSAs.

income of the state. We excluded neighborhoods that were either disproportionately high or low in comparison to the metro area's median income.

11. Once we identified the zip codes in a metro areas that were predominantly white or non-white with high foreclosure rates that could be considered middle- or working-class, we then used county property records, records kept by the clerks of courts, RealtyTrac, Zillow, Bank of America's REO listing website, REO auction websites, and confidential data obtained pursuant to a contract with CoreLogic to identify all of the REO properties within those zip codes.

12. To ensure that we identified a sufficient number of comparator properties in both majority-white neighborhoods and communities of color—given that majority-white neighborhoods tend to be further from city centers—we used a concentric circles methodology. We began with the selected zip codes in the center of the metropolitan area then moved outwards in a circular manner until we had identified a sufficient number of properties in majority white neighborhoods. We relied on the local knowledge of organizational plaintiffs to assess the boundaries of metropolitan areas.

13. Once this selection process was complete, Plaintiffs evaluated all of properties in the selected zip codes at the time of that metropolitan area's investigation that had been in Bank of America's possession for more than 30 days or were actively being marketed. We excluded properties that had been acquired by the Bank within 30 days to allow Defendants proper time to remedy any preservation and maintenance issues that may have existed at the time of acquisition—with one exception: if a property was acquired within the grace period, but Bank of America was actively marketing it, then we would include that property. Otherwise, the only

properties that were not evaluated were REOs that appeared to be currently occupied,⁴ were actively undergoing maintenance work at the time of the investigators' visit, or were vacant lots or apartment buildings.

14. To carry out the investigation NFHA designed, we developed and implemented a rigorous two-day training program for the staff of the fair housing centers that would be conducting the investigation. Shanti Abedin (previously NFHA's Senior Project Coordinator and later, Director of Inclusive Communities), Shanna Smith (the former President and CEO of NFHA), and I (as the then-Associate Director of Enforcement)—alone or in some combination—would lead the first day of training in a classroom format. This full-day of training provided background on the investigation and its purpose, details on each of the individual deficiencies on the checklist and how to evaluate them using a reasonable-person standard, and how to systematically evaluate each property using the REO Evaluation Form and a consensus approach to scoring deficiencies with a partner while in the field. We used a PowerPoint that contained photographic examples of what would constitute a deficiency (and what would not) and a glossary of all relevant terms. Trainees were instructed to take current conditions—*i.e.*, weather and season—into consideration when evaluating properties. We also instructed the trainees on how to properly photograph each property visited and all deficiencies observed. Attached hereto as Exhibit A is a true and accurate copy of the NFHA REO Investigation Training PowerPoint

⁴ This exclusion criterion was different from the deficiency category of “unauthorized occupants.” A property would only be excluded on grounds of occupancy if it appeared someone was actually still living in the home at the time of Plaintiffs’ evaluation (*e.g.*, there was furniture in the home or children’s art in the window). We did this to increase the likelihood that we were only investigating properties where the Defendants had the opportunity to do their initial maintenance and trash out. If there was simply evidence of a home being occupied (*e.g.*, food or a sleeping bag in the corner of an otherwise empty room), but there was no sign that the previous homeowners or tenants remained in the home at the time of the evaluation, then the property would be evaluated and the “unauthorized occupants” deficiency marked.

used in Connecticut in May 2013—a typical example of the PowerPoint presentations used in all trainings in this investigation. I understand this PowerPoint was produced to Defendants as NFHA 001371.

15. The second day of the training allowed investigators to shadow experienced testers in the field. This provided trainees with an opportunity to practice recognizing and documenting deficiencies using the checklist and taking all required photographs while receiving immediate feedback from an experienced team member such as myself.

16. After the initial trainings of each organizational plaintiff's staff, NFHA would provide ongoing trainings and support via webinars throughout the duration of the investigation. Additionally, Ms. Abedin and I were available to provide review and answer questions from each organization trained.

17. The investigation was conducted in the 37 selected metro areas between 2011 and 2018. With very few exceptions, each selected property was visited once by a team of investigators⁵. Investigators were sent out in pairs (or sometimes in larger groups) with lists of REO properties to investigate that included the street address, city, zip code, and lender name for each property. They were also provided with maps or driving directions, copies of blank REO Evaluation Forms, and cameras with timestamp capability. The investigators then followed a data collection protocol based on their training consistently across the metro areas. Investigators would evaluate the property and come to a consensus on whether a property condition qualified

⁵ At times, a property may have been visited twice because it was an REO at the time of two separate visits. In these rare instances, any additional photographs were added to the database but the scoring from the first visit was the only one recorded. In a very small percentage of cases, NFHA may also have visited properties a second time to informally observe any changes in the condition of the property. In these cases, too, only scoring from the first visit was recorded in the database.

as a deficiency based on a reasonable person standard. If they ultimately agreed a deficiency was present, they would mark it on the REO Evaluation Form and take at least one picture of the condition that they considered a deficiency.

18. Investigators would also take photographs of the front, back, and sides of the houses, neighboring properties (adjacent and across the street), and views of the street in both directions. In October 2014, NFHA instructed partner organizations to have their investigators also take photographs of positive marketing features such as well-maintained lawns or nicely-trimmed shrubs and encouraged them to take photographs from multiple perspectives. A true and accurate copy of the instructions provided to investigators during refresher training in October, 2014, on how to take photographs, NFHA REO Investigation Photo Protocols, is attached hereto as Exhibit B. I understand these instructions were produced to Defendants as PLAINTIFFS 074567.

19. When property evaluations were complete, investigators returned to their office where they or a trained colleague would upload the deficiency data and all photographs into a central REO database.⁶ This was done as soon as practicable after investigators returned to their offices. Investigators would log in with a personalized username and password and create a new record for an REO property that included the full address, the date the property was visited, the bank that owned the property, and any relevant notes such as the source relied upon to find the property. To add deficiencies discovered during the investigation to a property record, the staff member would add a new photo/deficiency, upload the photo of the condition that qualified as a deficiency, select the category and subcategory of the deficiency, and hit save. Staff members

⁶ Some organizations, like NFHA, would also input data from the paper REO Evaluation Forms into an Excel spreadsheet version of the evaluation form. The Excel evaluation forms were then saved on a shared drive.

would also add all other photographs to the database and were required to enter a description for each photograph that was not associated with a deficiency. To assist with the data entry, staff members were provided with a document called “Guidelines to using the REO Investigation Database.” A true and accurate copy of this document is attached hereto as Exhibit C and, I understand, was produced to the Defendants as NFHA 004961.

20. In some cases, investigators would use the REO Evaluation Forms in the field to jot down notes about their observations, these notes were generally used to describe what was captured in the photographs for their own reference when uploading the information to the database. When transferring data from the forms into the database, investigators or staff would include the notes that were (1) relevant, and (2) not duplicative with the photograph descriptions or what was contained in the photographs themselves.

21. I have reviewed all of the 224 handwritten notes that appear on the 67 paper REO Evaluation Forms produced for the properties at issue in this case thus far. For each note, I checked whether the content of the note was relevant to the investigation and, if so, whether it was captured in either a description or photograph saved in the REO database. A true and accurate copy of a spreadsheet I created that contains each handwritten note and whether and how the substance of the note was preserved in database is attached hereto as Exhibit D.

22. As Exhibit D shows, with only 3 exceptions, all of the relevant content of the 224 handwritten notes was captured in the database through photographic evidence or in the description field of a photograph.

23. Of the three exceptions where a relevant note was not transferred to the REO database, two of them⁷ were ultimately not recorded as deficiencies because there was no photographic evidence to support the existence of a deficiency. This is consistent with our general quality control policy that all deficiencies must be supported by photographic evidence. The third note—which referenced broken glass in the back of a property—was not captured with a photograph, but the trash deficit (which would have been the appropriate category for broken glass on the ground) was already marked for this property and supported by other photographic evidence.

24. When investigators and fair housing organization staff completed uploading the data from the REO Evaluation Forms to the database, they were instructed to comply with their own document retention policies when considering how to retain or dispose of the paper forms. In compliance with NFHA’s own investigation document retention policy, NFHA staff discarded the paper versions of the evaluation forms of the properties our staff investigated because we considered them preliminary drafts that contained rough notes and the relevant information on the forms became duplicative once it was saved to the REO database. We disposed of the paper versions immediately after uploading the data or as soon as practicable. We considered the REO database the final business record of the evaluations.

25. Ms. Abedin and I would review entries made by local fair housing organization staff and provide feedback on the upload and data entry process as necessary. Ms. Abedin, Shanna Smith—NFHA’s then-President and CEO—and I had access to edit entries for quality control purposes. We would review evaluation data, photographs, and deficiencies for

⁷ One was a reference to wasp nests at 3615 Rising Sun Lane, Dallas, Texas—a property in a community of color. The other note pertained to a driveway being in disrepair at 45 Ellsmere Avenue, Waterbury, Connecticut—a property in a majority-white community.

standardization across metro areas and investigators, and we would be especially sure to review the entries of newer investigators. This was done in batches as other fair housing organizations uploaded them to the database. If necessary, Ms. Abedin and I would edit entries for standardization.⁸ Most often, our edits did not change the total number of deficiencies for a property. Our edits would more typically involve things like changing the orientation of a photograph, editing a description associated with a photograph for accuracy or spelling corrections, or reclassifying a deficiency to a more appropriate category (like moving a “miscellaneous” deficiency to a more specific and applicable deficiency category). When we did make edits that affected the total scoring, it was based on the photographic evidence; if there was no photographic support for a deficiency, we would delete it. Whenever we made edits to the database affecting the scoring of a deficiency, we would first consult with each other to determine whether an item was a deficiency or not, in accordance with the instructions we provided during trainings.

26. After the property evaluations were completed and entered into the database, we categorized all evaluated properties as being in either a predominantly-white neighborhood, African-American, Latino, or majority non-white block group based on 2010 U.S. Census data. To do this, we downloaded 2010 racial demographic data from the U.S. Census website and then employed ArcGIS to conduct an analysis that determined the Census block group in which an REO property was located. If an REO property was located in a Census block group that was >50.0% white, it was designated as being located in a predominantly white neighborhood; if an REO property was located in a Census block group that was >50.0% African-American, Latino,

⁸ Despite having access to edit records, Shanna Smith did not at any time make edits to the database. Additionally, local organizations would access the database only for the records their staff had collected and entered.

or non-white, it was designated as being located in a majority African-American, Latino, or non-white neighborhood.

27. Other data collected for the properties was also added to the database including the census block data, the year built, the lender, date of visit, and person who uploaded the data for the property. The final product was a database of electronically-stored information that enabled us to aggregate data and export data into spreadsheets in whole or based on selected factors such as location or lender. The database served as the final and complete record of all properties that were investigated in this case.

28. Attached hereto as Exhibit E is a true and accurate copy of exported data, in spreadsheet form, from the REO database for all 1,405 properties currently at issue in this litigation. I understand this data export was produced to Defendants as PLAINTIFFS 74576. For each property, Exhibit E contains the property's unique ID number, date of visit, street address, city, state, zip code, lender, the total number of deficiencies, the race of the neighborhood, and whether or not each category of deficiency was present at the property. The presence of a deficiency is indicated as a "1" if the deficiency was present, and a "0" if it was not. Although the REO Evaluation Form used in the investigation included spaces to note whether the gas or electricity was turned off, we did not consider these to be deficiencies in evaluating the findings and, therefore, Exhibit E, does not include these categories.

29. From the data in Exhibit E, I analyzed whether properties in communities of color had more deficiencies than properties in majority-white communities. In addition to analyzing all of the investigated properties in all 37 metro areas as one group, I also analyzed properties in each of the metro areas separately to see if the racial disparity in maintenance and marketing present in the entire data set also persisted within each individual metro area investigated. A true

and accurate copy of my analysis of the investigation findings for the at-issue properties are attached hereto as Exhibit F.

30. I understand that Safeguard disputes responsibility for many of the 1,405 properties now at issue in the case, admitting responsibility for only 778 of these properties. Therefore, I conducted a separate analysis just for these 778 undisputed properties for Safeguard, again utilizing the data from Exhibit E. I analyzed the disparity in all deficiencies between properties in neighborhoods of color and in majority-white neighborhoods and then isolated the individual deficiencies that Safeguard's expert, Marcel Bryar, agrees are within industry standards always or sometimes.⁹ A true and accurate copy of the results of this analysis are attached hereto as Exhibit G.

31. Because both boarded and broken windows were considered one combined deficiency and the "unsecured/broken doors and locks" deficiency included boarded doors, I conducted a separate analysis to determine which properties had these deficiencies marked because of a boarded window or door and which had them marked because of a broken window or door (or otherwise unsecured door). I conducted this analysis based on photographs from the database and tracked the results of the analysis in a spreadsheet. In some cases, a deficiency was marked because of the presence of both boarded and broken windows or doors. In these cases, I marked the property as having a boarded window or door. A true and accurate copy of this spreadsheet, which I understand was produced to Defendants as RUGH 10, is attached hereto as Exhibit H, as is being produced in native form.

32. To analyze whether the "for sale sign missing" deficiency for properties with Federal Housing Administration ("FHA") or Veterans Affairs ("VA") loans impacted the

⁹ See Ex. 5 to Bryar Rep., ECF No. 171-3.

disparity in deficiencies between properties in communities of color and in majority-white communities, I relied on the information provided by Bank of America on the types of loan foreclosed on for each property (BANA-NFHA-LIT_0322596). I conducted an analysis that removed the “for sale sign missing” deficiency for all properties with FHA or VA loans. Doing so did not meaningfully change the racial disparity present in the investigation results. A true and accurate copy of the results of this analysis are attached hereto as Exhibit I.

33. The database also allowed us to export an Excel spreadsheet of all photographs in the database and relevant information pertaining to each one. In total, the database contains more than 30,000 photographs for the 1,405 properties at issue in the Bank of America investigation. The database export of photograph information contains the property ID number, the person who entered the data (“Creator”) and their organization, the date and time the entry was made, the name and category of the deficiency associated with the photograph (if any) or a description of the photograph if no deficiency was selected, the file name of the photograph, and any notes associated with the entry. If the entry was ever edited, information on the most recent edit to the photograph (or description accompanying the photograph) would appear in the spreadsheet including the person who edited the entry (“Editor”), their organization, and the date and time of the edit. I understand this export was produced to Defendants as PLAINTIFFS 73312 and a true and accurate copy of it is attached hereto as Exhibit J.

34. Attached hereto as Exhibit K is a true and accurate copy of a spreadsheet, produced in native form, that combines what I understand to be all of the third-party quality control spreadsheets on REOs that Plaintiffs received from Defendants: (a) BANA-NFHA-LIT_0312184, 0312203, 0312212, 0312240, 0312263, and 0312312; and (b) SG 00185694, 00185752, 00185765, 00185835, 00185894, 000185932, 00185972, 00186009, 00186052,

00186106, 00186139, 00186192, 00186227, 01186264, 00186316, 00186348, 00186381, 00186413, 00186451, 00186499, 00186530, 00186565, 00186619, and 00186632. I added the race of the Census block group in which each property was located to this spreadsheet using the method described in ¶ 26.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 14, 2022



Lindsay K. Augustine

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

NATIONAL FAIR
HOUSING ALLIANCE, *et al.*,

v.
Plaintiffs,

BANK OF AMERICA, N.A., *et al.*,

Defendants.

*
* Civil Action No. CCB-18-1919
*
*
*

EXHIBIT LIST

Ex. No.	Description
A	NFHA REO Investigation Training PowerPoint (NFHA 001371NF-HA 001484)
B	NFHA REO Investigation Photo Protocols (PLAINTIFFS 074567)
C	Guidelines to using the REO Investigation Database (NFHA 004961–NFHA 004963)
D	Handwritten Notes Analysis
E	REO Database Export (PLAINTIFFS 074576)
F	Investigation Findings
G	Deficiency Analysis of Safeguard Undisputed Properties
H	Broken Door/Window Analysis (RUGH 000010)
I	FHA/VA Loan Analysis of “For Sale Sign Missing”
J	Export of Database Photograph Details (PLAINTIFFS 073312)
K	Third Party Quality Control Data (filed under seal)

EXHIBIT A

PART 1: Discrimination in the Maintenance and Marketing of REO Properties



Purpose of the Investigation

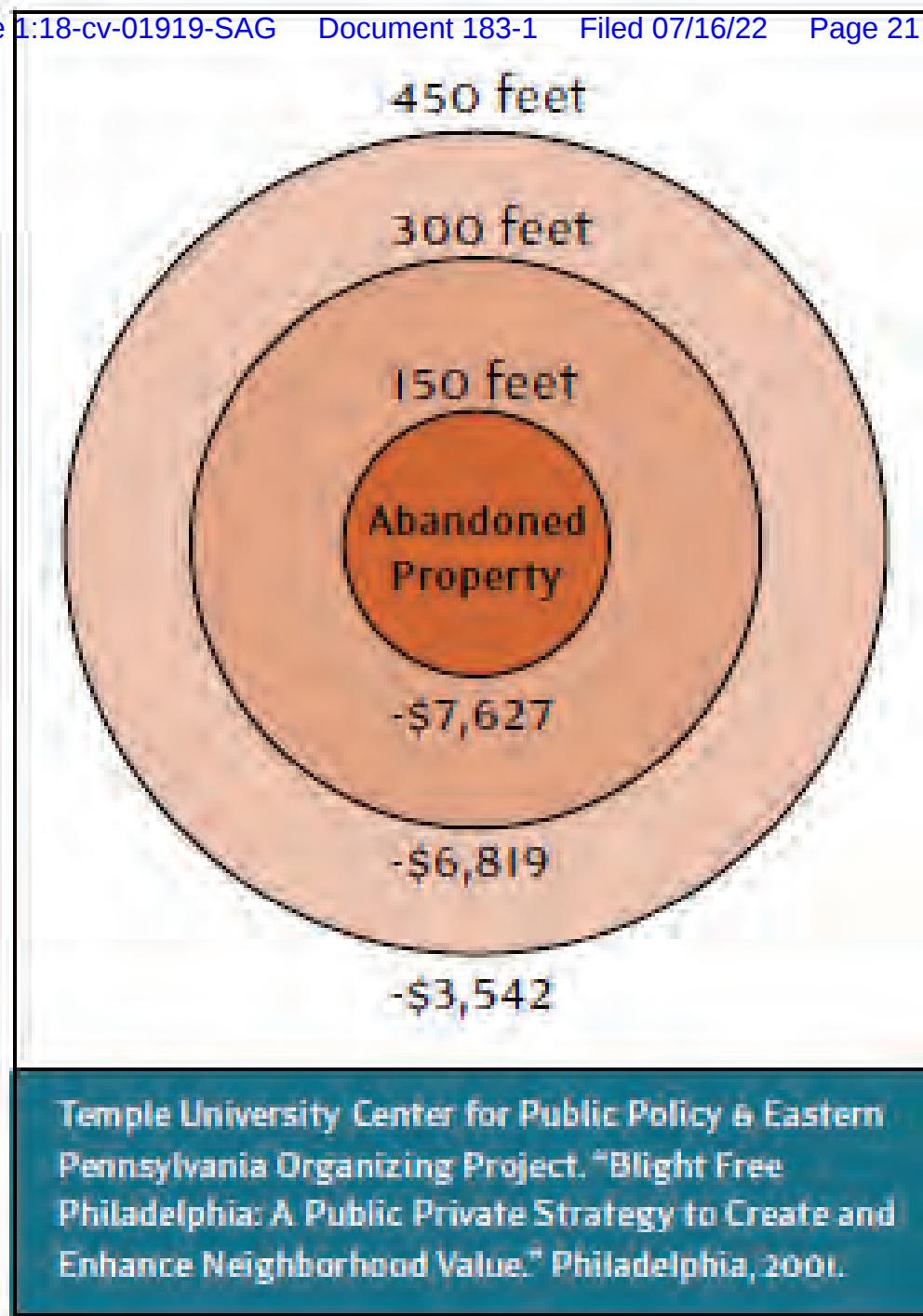
- Foreclosure crisis continued to affect 1 out of 69 families in 2011 (2.7 million)
- REOs could reach 1 million properties per year in 2012 and 2013
- Communities of color have been disproportionately affected
- Proper maintenance and marketing in the disposition process for REO properties emerges as a key civil rights issue
- NFHA's actions so far



Background: REOs and Communities

- Wealth Loss in Communities of Color
- High Costs to Municipalities
- Depleted property tax base
- Investors buying up the neighborhood





3803 Bonner Road, Baltimore

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NO LOITERING
ASSISTANCE FOR
TRAPPED ANIMALS
CALL 311

- Boarded 8 times
- Cleaned 7 times
- Inspectors and 311 callers reported at this property: fallen ceilings, squatters, fire
- Total spent on boarding and cleaning alone since January 2007: \$2603.23

3622 Edmonson, Baltimore

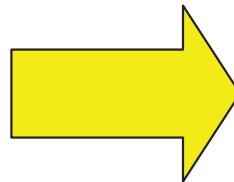


- Boarded 5 times
- Cleaned 11 times
- Total spent on boarding and cleaning since June 2006: \$2626.13

Lenders, Vendors, and Maintenance

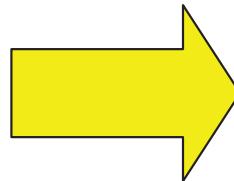
- Lender Management of REOs
- Real Estate Brokers
- Preservation Management Companies (aka Field Service Vendors, Asset Management Providers, etc.)





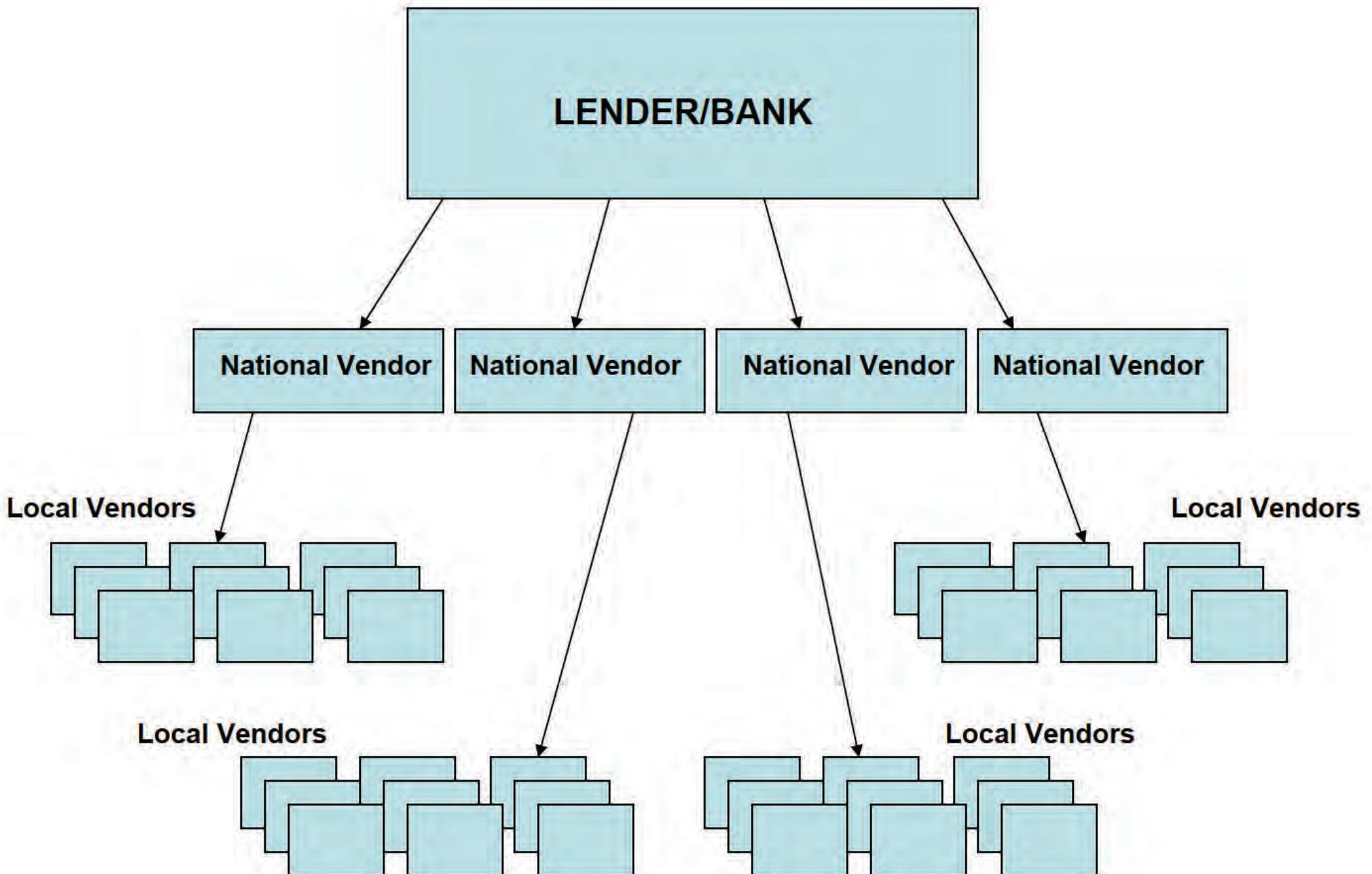
Asset Management Provider/Field Service Vendor

Responsible for routine maintenance, lawn upkeep, securing property etc.



Listing Broker/Agent

Responsible for marketing the home, signage, sometimes requesting repairs



It's the Law

- The Fair Housing Act has two goals:
 - to eliminate housing discrimination and
 - to promote residential integration
- HUD's regulations interpreting the Fair Housing Act state:
 - It shall be unlawful because of race, color, religion, national origin, sex, familial status or disability to restrict or attempt to restrict the choices of a person by word or conduct in seeking, negotiating for, buying or renting a dwelling so as to perpetuate segregated housing patterns, or to discourage or obstruct choices in a community, neighborhood or development.



It's the Law

- The differing maintenance of REO properties based on the racial or ethnic composition of neighborhoods is a violation of the Fair Housing Act.
- HUD's regulations clearly state that "failing or delaying maintenance or repairs of sale or rental dwellings because of race. . ." is a prohibited action under the Fair Housing Act.



It's the Law

- Steering by real estate agents based on neighborhood racial composition is illegal and other behavior in the sale or rental market that operates to discourage potential buyers from purchasing or renting homes, such as by failing to adequately maintain properties in communities of color, can also violate the Act.
- It is unlawful to “make unavailable or deny” housing to any person because of race, national origin...
- If the poor maintenance of an REO property in an African-American or Latino neighborhood makes it difficult for a potential purchaser to obtain a mortgage loan for the property, the poor maintenance has made the housing “unavailable” within the meaning of the Act.

Methodology

- Neighborhoods are either predominantly White or predominantly Latino, African-American, or a combination of both.
- Neighborhoods selected have recent high foreclosure rates located in the zip codes evaluated.
- 100% of REOs held by specific lenders were evaluated within the zip codes.



Curb Appeal	20
Trash	
Mail Accumulated	
Overgrown Grass and Leaves	
Overgrown or Dead Shrubbery	
Dead Grass	
Invasive Plants	
Broken Mailbox	
Structure	25
Unsecured or Broken Doors and Locks	
Damaged Steps/Handrails	
Damaged Windows	
Damaged Roof	
Damaged Fence	
Holes	
Wood Rot	
Signage & Occupancy	13
Trespassing or Warning Signs	
Marketed as Distress Property	
"For Sale" sign missing	
Broken and Discarded Signage	
Unauthorized Occupancy	
Paint & Siding	12
Graffiti	
Peeling or Chipped Paint	
Damaged Siding	
Missing Shutters	
Gutters	16
Missing or Out of Place	
Broken or Hanging	
Obstructed	
Water Damage	13
Water Damage	
Mold	
Utilities	1
Exposed or Tampered with	

Where did we look?

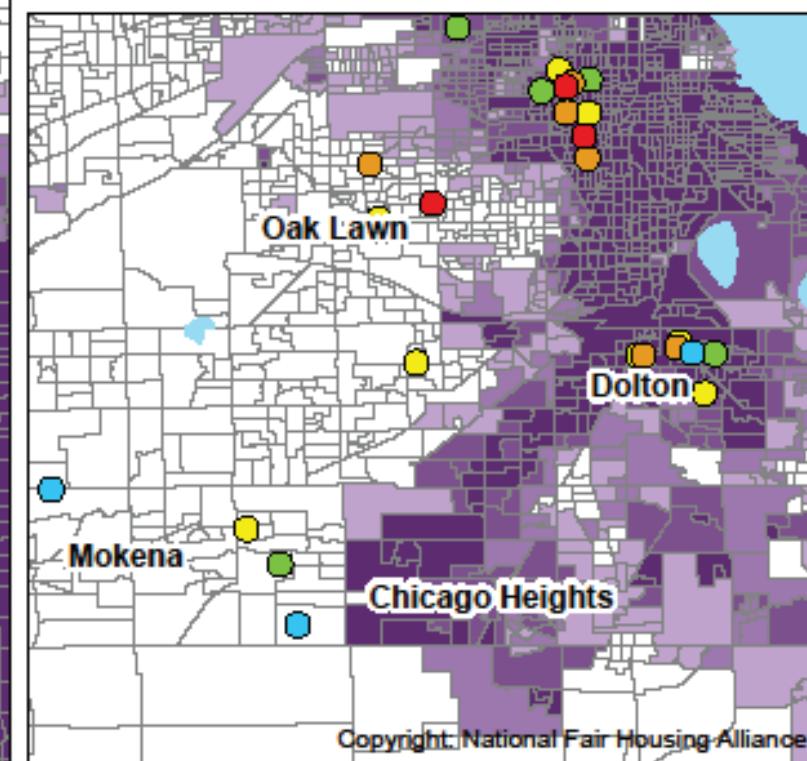
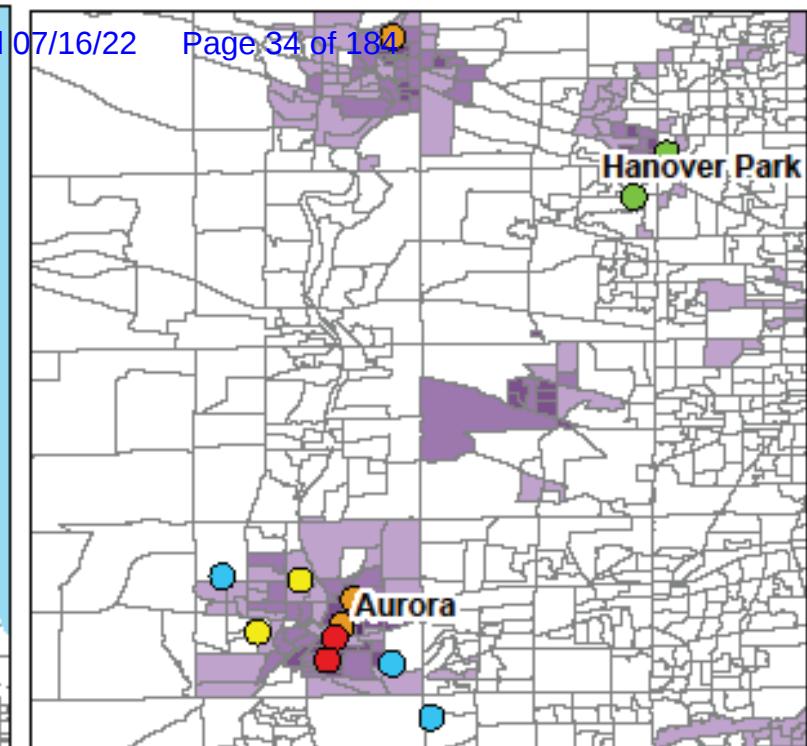
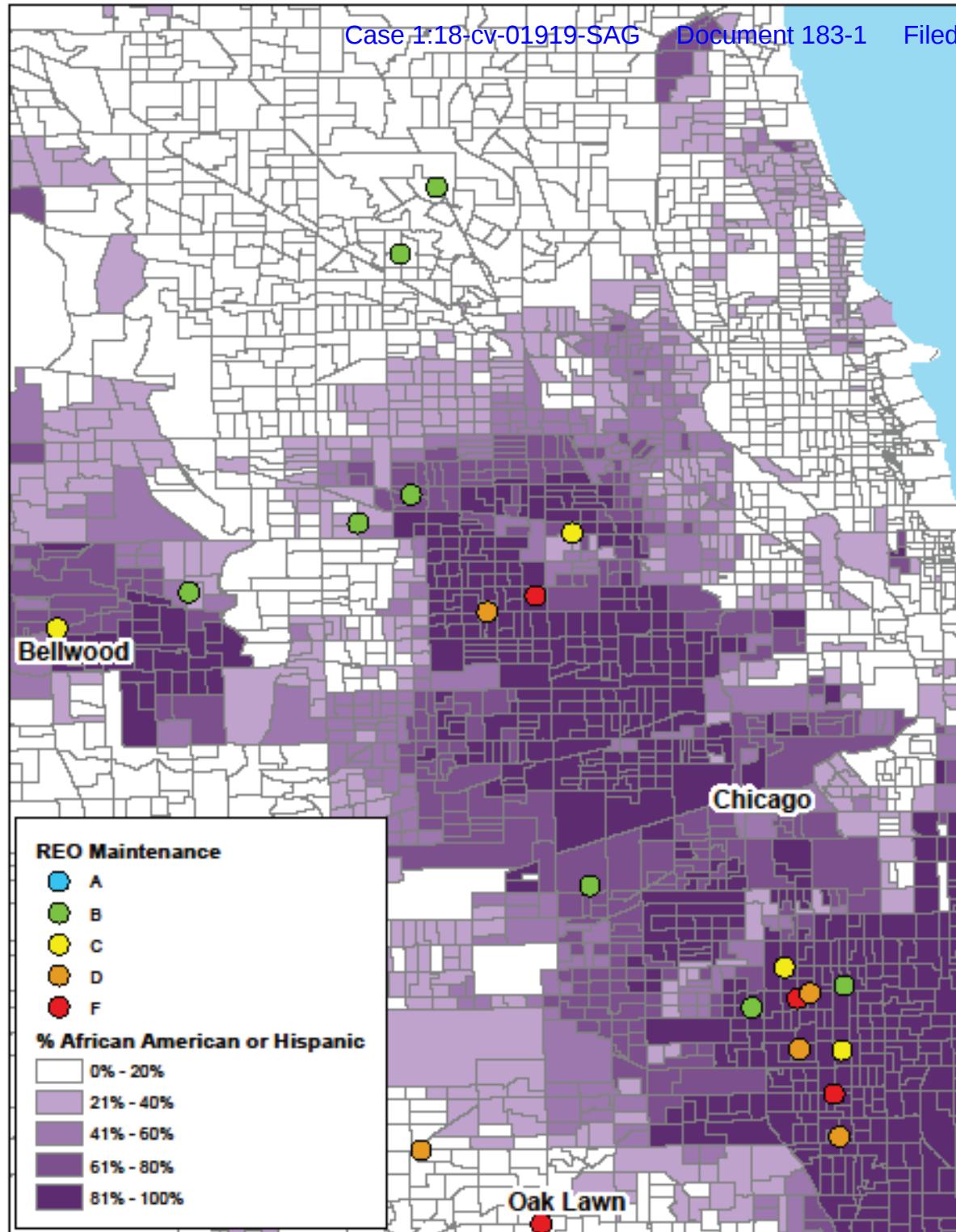
- Washington, DC
- Baltimore, MD
- Oakland Area, CA
- Philadelphia, PA
- Phoenix, AZ
- Charleston, SC
- Tucson, AZ
- Las Vegas, NV
- Sacramento, CA
- Dayton, OH
- Miami, FL
- Atlanta, GA
- Dallas, TX
- Chicago, IL
- Grand Rapids, MI
- Indianapolis, IN
- Milwaukee, WI
- Orlando, FL
- Toledo, OH



What did we find?

- REOs in communities of color were 42% more likely to have more than 15 maintenance problems than properties in White communities.
- Trash and debris were 34% more likely to be found on REO properties located in communities of color
- REO properties in communities of color were 82% more likely than REO properties in White communities to have broken or boarded windows.
- REO properties in predominantly White neighborhoods were 33% more likely to be marketed with a professional “For Sale” sign





4734 W Erie St, Chicago, IL 60644

Total Number of Deficiencies: 17

Neighborhood: Predominantly African-American

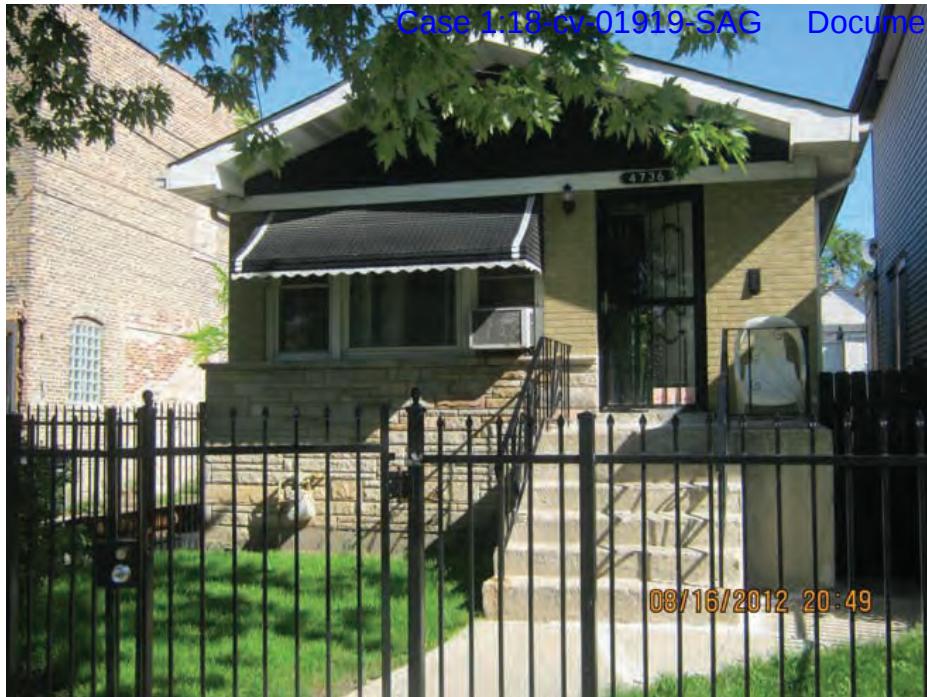


08/16/2012 20:42



4734 W Erie St, Chicago, IL 60644





Neighboring Properties to
4734 W Erie St, Chicago, IL 60644

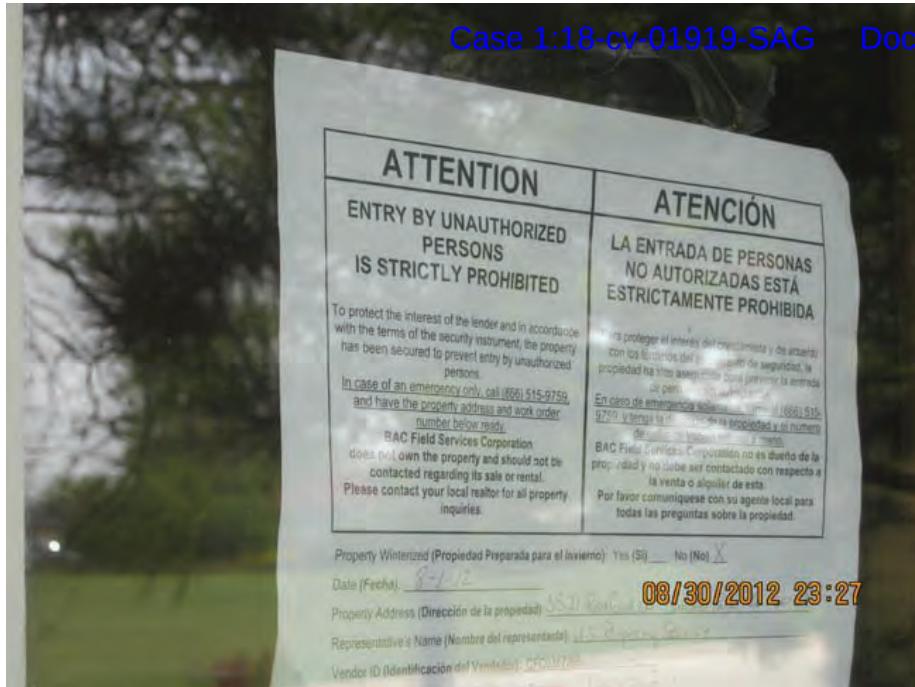


5521 Redford Lane, Hanover Park, IL 60133

Total Number of Deficiencies: 3

Neighborhood: Predominantly White



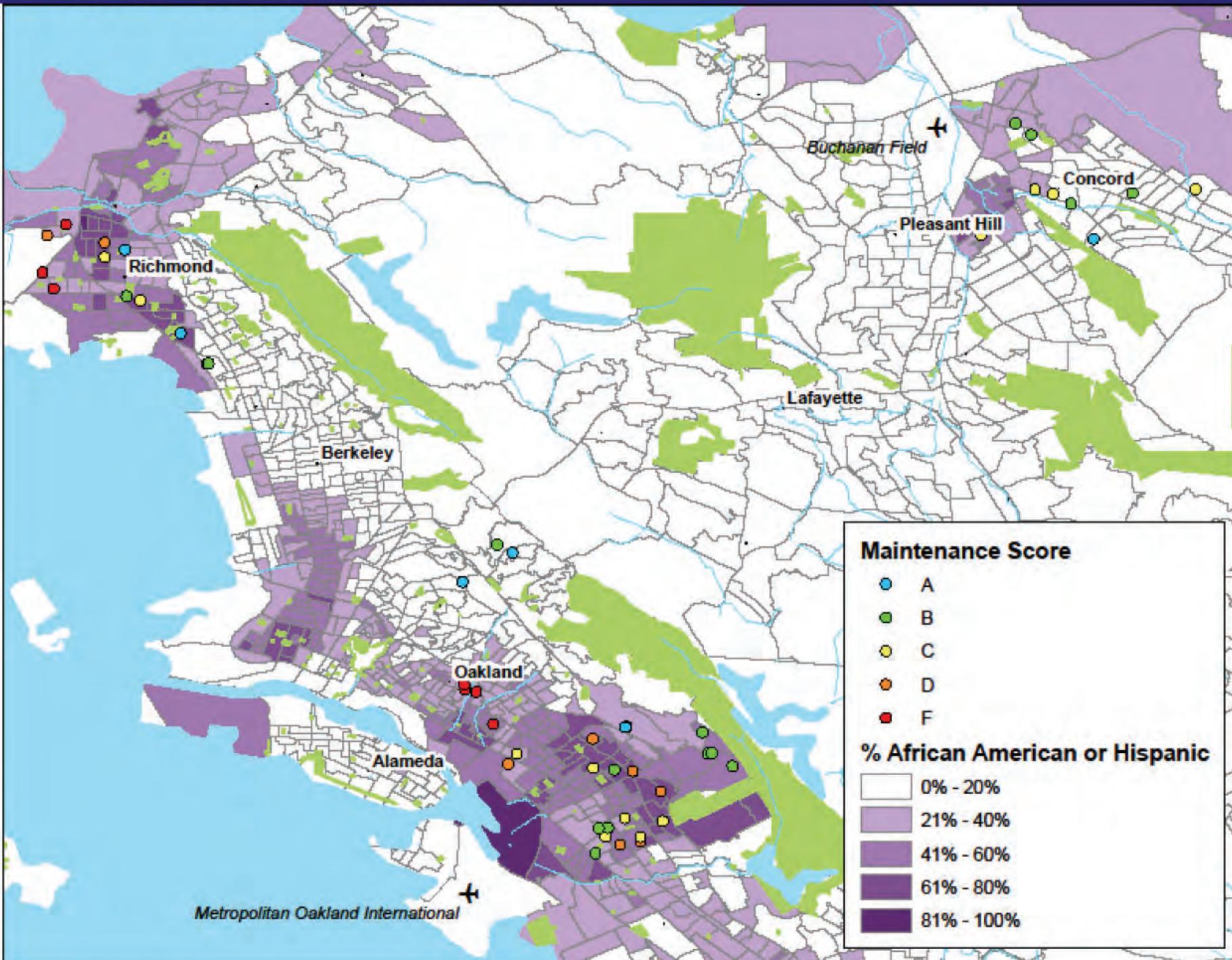


5521 Redford Lane, Hanover Park, IL 60133



Neighboring Property

East Bay Area, CA



East Bay Area, CA

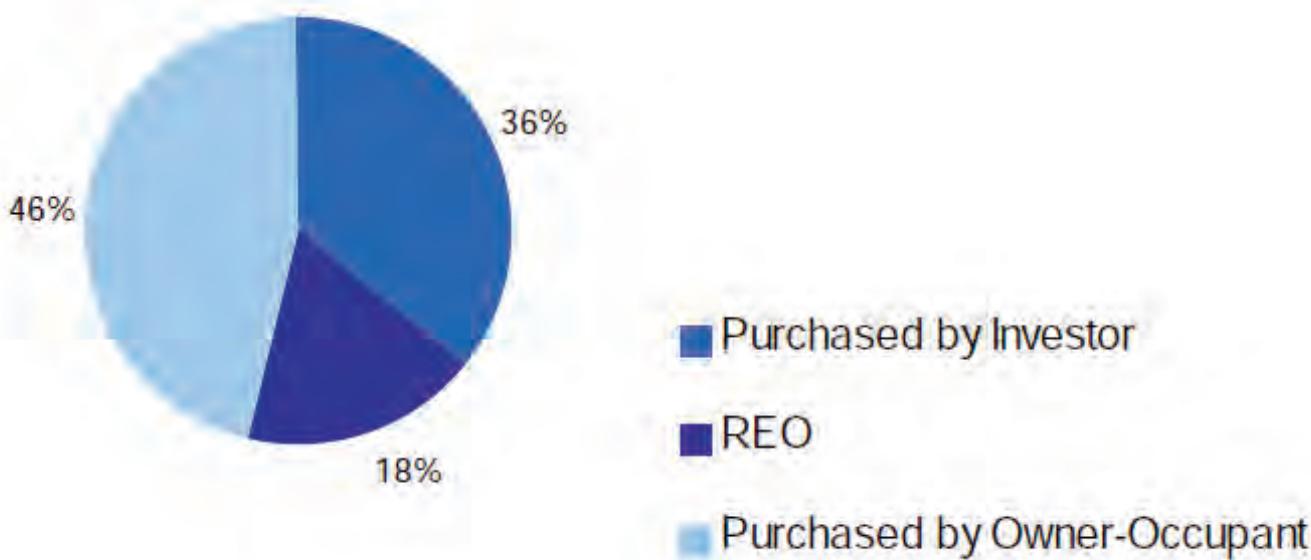


East Bay Area, CA

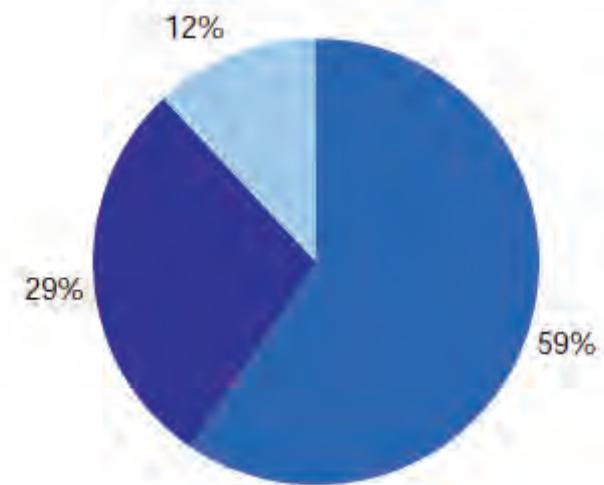


Findings: REO Disposition Outcomes

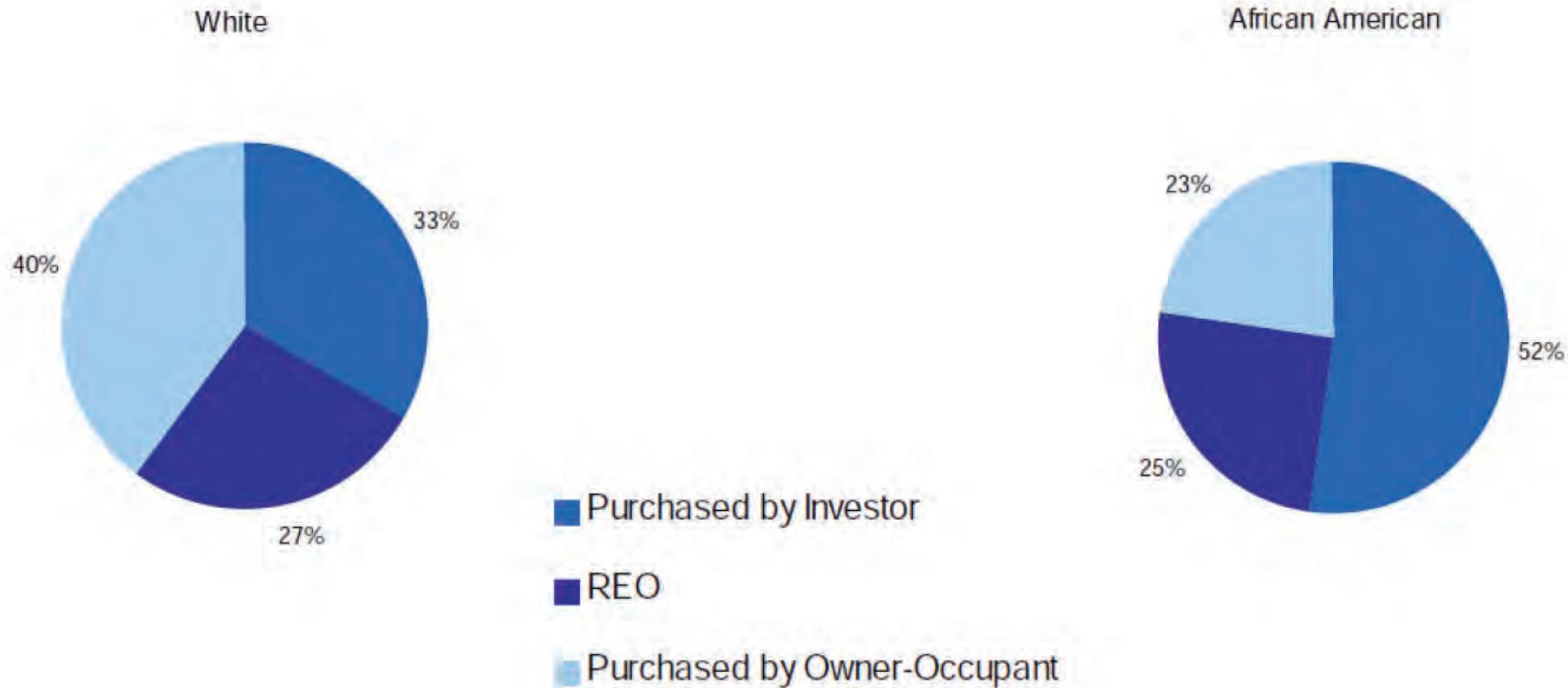
Maintenance Score A or B



Maintenance Score D or F



Findings: REO Disposition Outcomes



PART 2: Selecting Neighborhoods & Identifying Properties



Data Sources for Review

- **RealtyTrac** – www.realtytrac.com – monthly foreclosure data by region
- **Corelogic** – www.listsource.com, allows you to buy REO addresses with geography, date, and property type as specifications
- **US Census Bureau Data** – racial makeup of the neighborhood should be > 50%

- **www.homepath.com**— Fannie Mae's online REO listing tool
- **www.homesteps.com**— Freddie Mac's online REO listing tool
- **www.hudhomestore.com**— HUD Homestore (FHA)
- **Bank Websites** – REOs often listed, though very few
- **County Property Records**

FORECLOSURE RATES FOR NEW HAVEN, CT

April 2013



New Haven, CT
1 in every 760

Top 4 Zips

06515

1 in every 619

06513

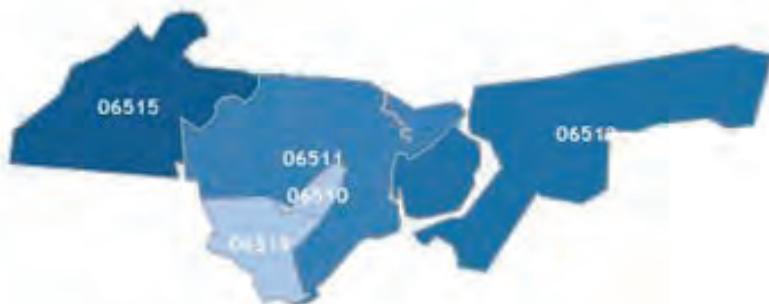
1 in every 717

06511

1 in every 784

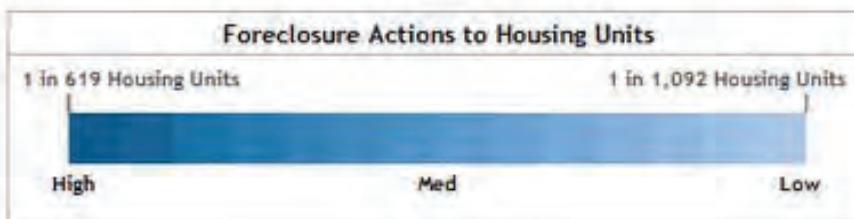
06519

1 in every 1092



Add this map to your website.

GET EMBED CODE



FORECLOSURE STATUS DISTRIBUTION FOR NEW HAVEN, CT

April 2013

The current distribution of foreclosures based on the number of active foreclosure homes in New Haven, CT.

Pre Foreclosures

Pre-Enforcement

Auction

Bank-Owned



Home > U.S. Real Estate Trends > Connecticut > Hartford County > Hartford

HARTFORD REAL ESTATE TRENDS & MARKET INFO

Summary Market Trends **Foreclosure Trends**

FORECLOSURE RATES FOR HARTFORD, CT

April 2013

Hartford, CT

1 in every 690

Top 5 Zips

06114

1 in every 452

06112

1 in every 508

06120

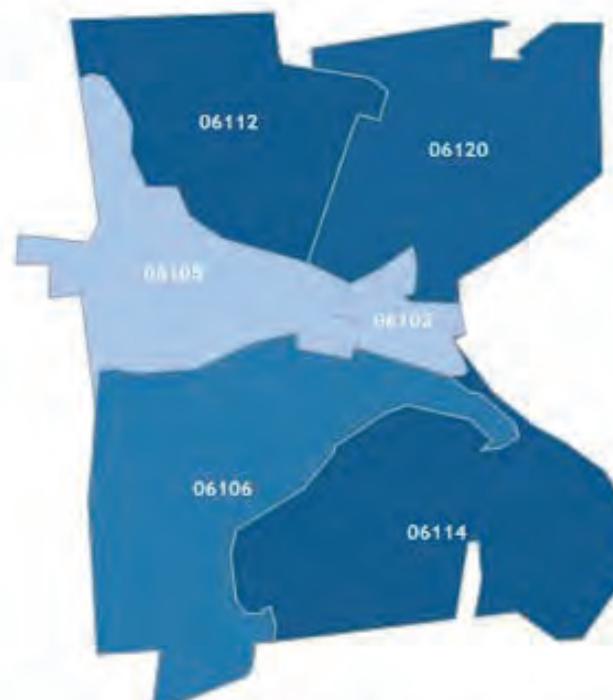
1 in every 598

06106

1 in every 805

06105

1 in every 1980



Add this map to your website.

[GET EMBED CODE](#)

Foreclosure Actions to Housing Units

1 in 452 Housing Units

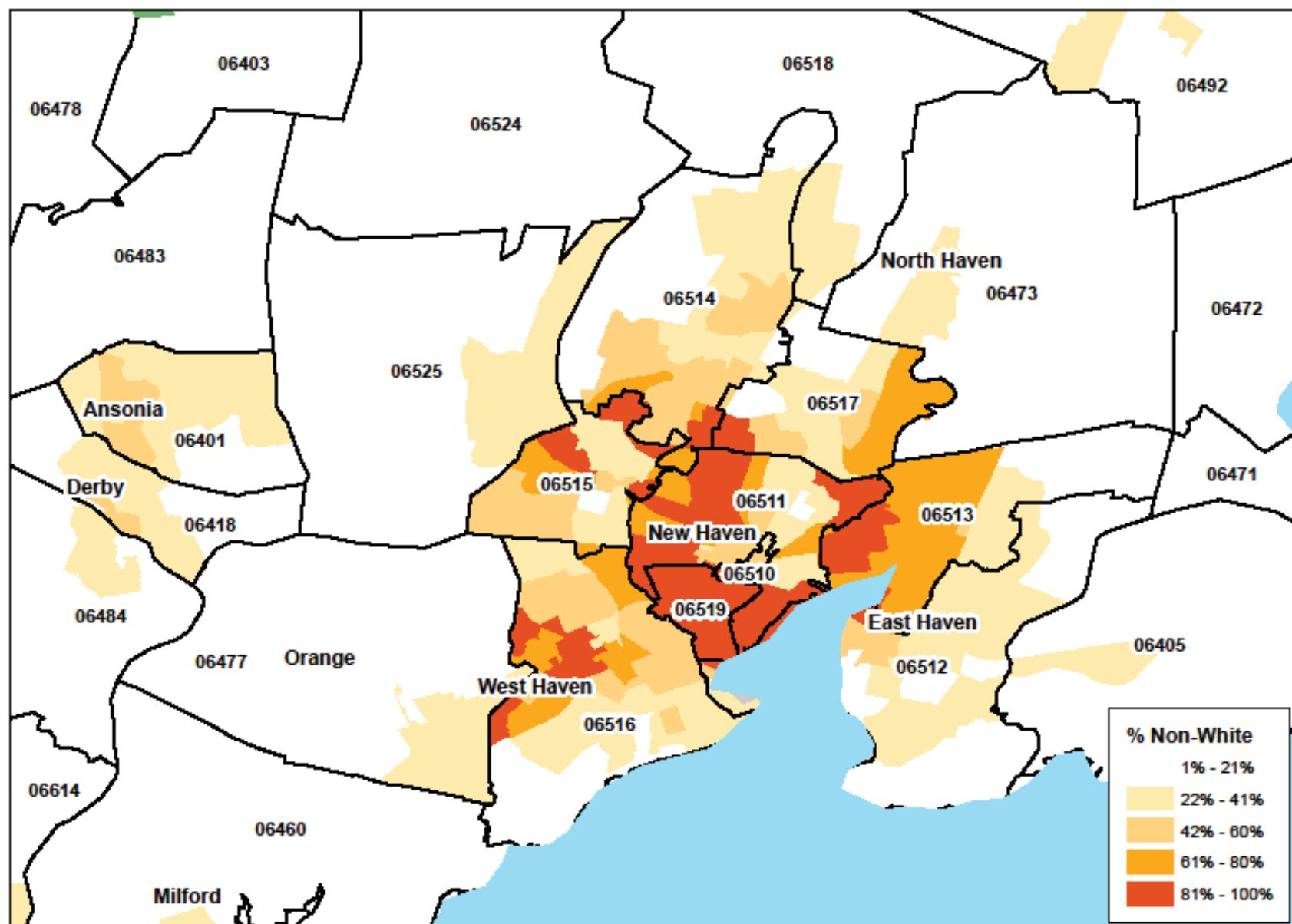
1 in 1,980 Housing Units

High

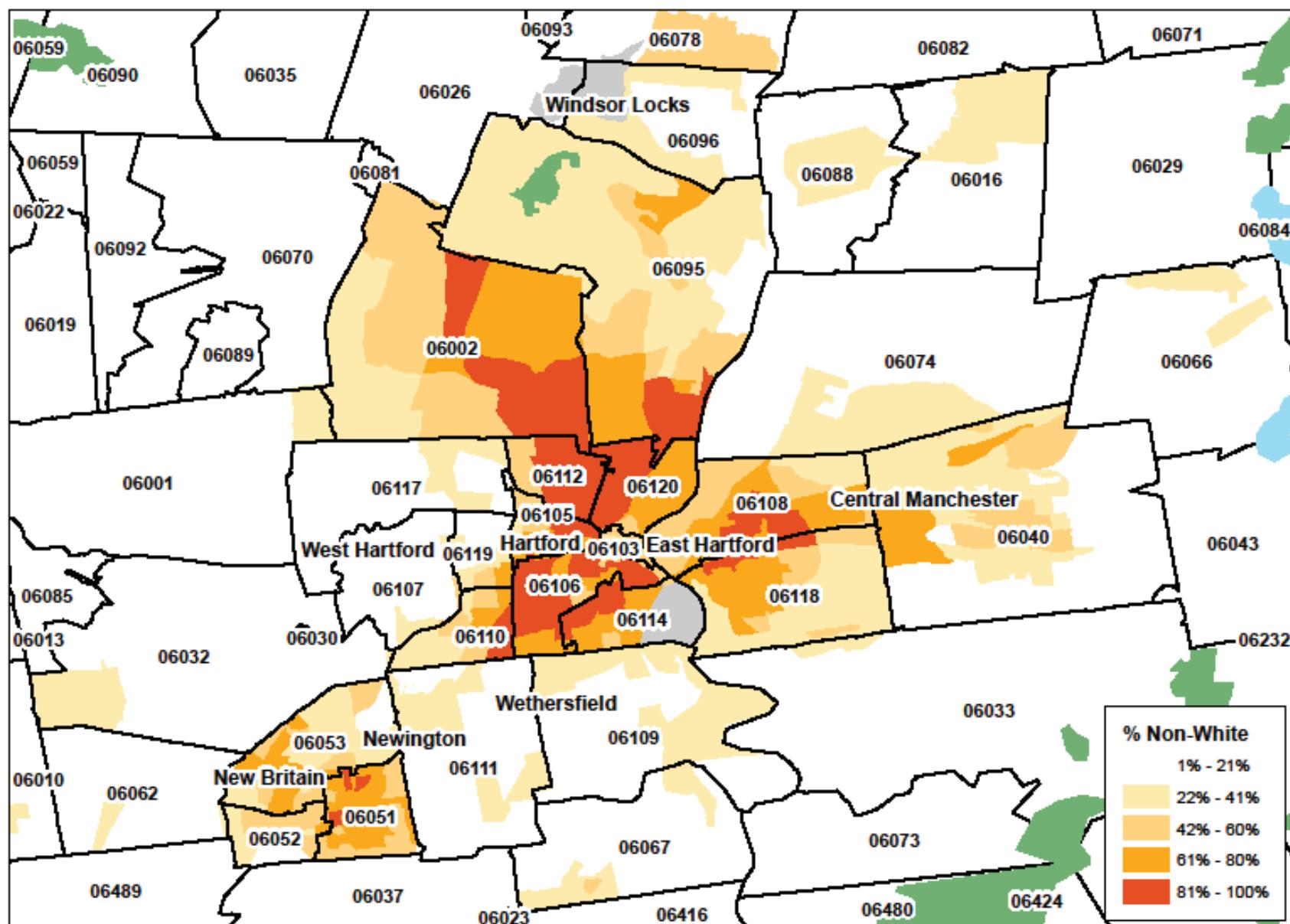
Med

Low

New Haven, CT 2010 Demographics by Block Group



Hartford, CT
2010 Demographics by Block Group



PART 3: REO Property Visits



NFHA
National Fair Housing Alliance

What do you need to score properties?

- Two person team
- List of Addresses/Itinerary
- GPS
- Camera with timestamp capability
- Clipboard
- Evaluation forms
 - Field Evaluation form ONLY

Photographs for EVERY Property

1. Address
2. Front view
3. Right side view
4. Back view
5. Left side view
6. Neighbor (left)
7. Neighbor (right)
8. Neighbor (opposite)

- Each deficit needs an additional photograph
- Remember to take a photograph of every sign posted on the property so that it is legible
- Turn time stamps ON

What if the Property is Occupied?

- Only 40-50% of REO properties on today's market are vacant
 - Tenants
 - Lengthy eviction processes
 - Personal property issues
 - Records not up to date
- Take a photograph of the property including the address
- Document on score sheet that the property was occupied/work in progress



REO Property Investigation Glossary

Curb Appeal

- Trash
- Accumulated mail
- Overgrown grass
- Overgrown shrubbery
- Dead grass
- Invasive plants
- Broken mailbox
- Leaves

Trash

- ❑ Anything worthless, useless, or discarded on the subject property



Accumulated Mail



- ❑ Letters, packages, flyers, etc. that have piled up



Overgrown Grass



- Lawns that have become overgrown—high grass or weeds
- Take a picture that shows perspective for height of grass



Overgrown / Dead Shrubbery

O overgrown dead
sh shrubs



Leaves

- Any area where dead leaves have not been raked up and disposed of properly



Dead Grass

- Lawns or large sections of lawns



Invasive Plants

- Overgrown weeds, vines, etc. that are growing up the side of a house or taking over the shrubs/lawn



Broken Mailbox



- Ruptured, fractured, hanging, or missing mail boxes

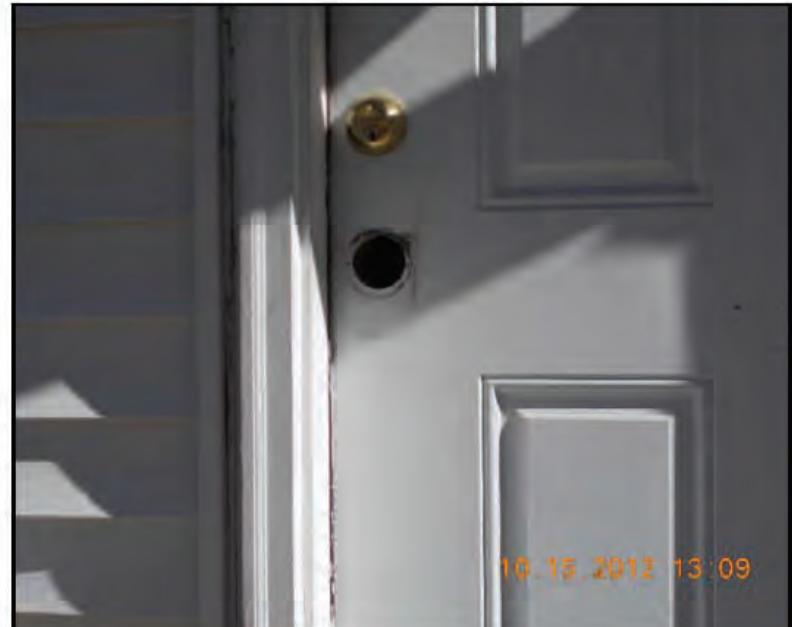
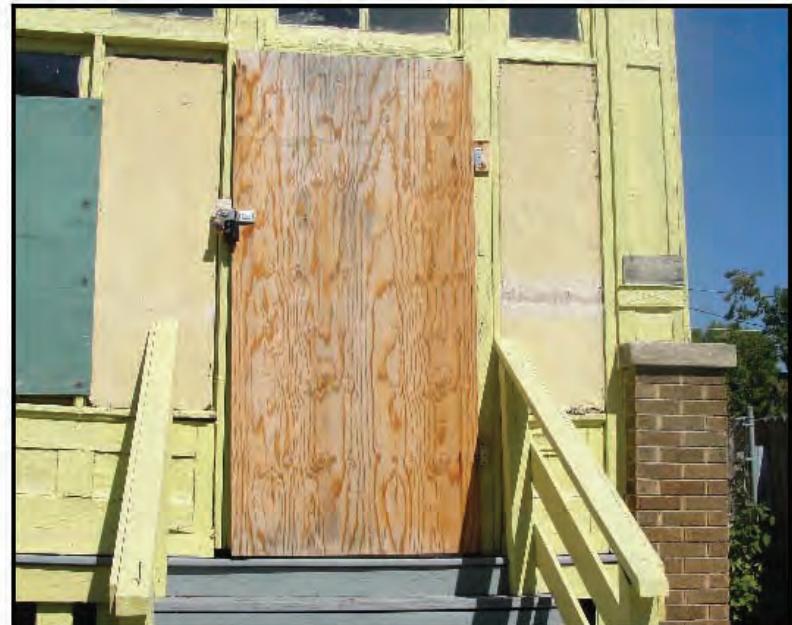


Structure

- Unsecured/broken doors and locks
- Damaged steps
- Damaged windows (Broken, boarded)
- Damaged roofs
- Damaged fences
- Holes
- Wood Rot

Unsecured/Broken Doors and Locks

- Doors that are open or off of the hinges
- Missing locks, doorknobs, screens, etc.
- Boarded doors



Damaged Steps or Handrails

- Missing or broken steps
- Any obstruction on the steps or porch
- Missing or broken hand rails



Damaged Windows



- Windows missing a glass, or covered in plastic or tarp
- Boarded up windows



Damaged Roofs

- ☐ Roofs with holes, covered in tarp, with misplaced or broken shingles, or appearing unstable



Damaged Fences

- ❑ Fences that are broken, hanging or partially missing



Holes



- Openings in the structure of the subject property



Wood Rot



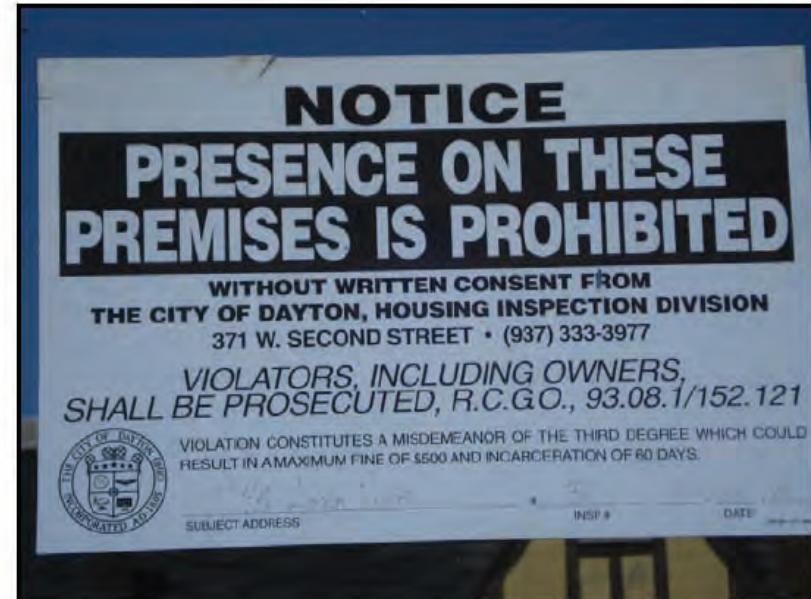
- Deterioration or decay found on the wooded areas of the subject property

Signage

- Trespassing/warning signs
- Marketed as distressed property
- No “For Sale” sign posted
- Broken and discarded signage
- Unauthorized occupancy

Trespassing/Warning Signs

- Subject properties with signs prohibiting wrongful entry



Marketed as Distressed Property



Broken and Discarded Signage



Unauthorized Occupancy

- Truck or cars parked in driveway of vacant homes.
- People loitering or using premises



Paint/Siding

- Graffiti
- Peeling/chipped paint
- Damaged siding
- Missing shutters (not attached/secure)

Graffiti



- Any images or lettering scratched, painted, or marked on the subject property



Peeling/Chipped Paint

- Paint chipping or peeling on various surfaces of the subject property



Damaged Siding



- Missing, broken, seriously dented, or peeling siding material

Missing or Damaged Shutters

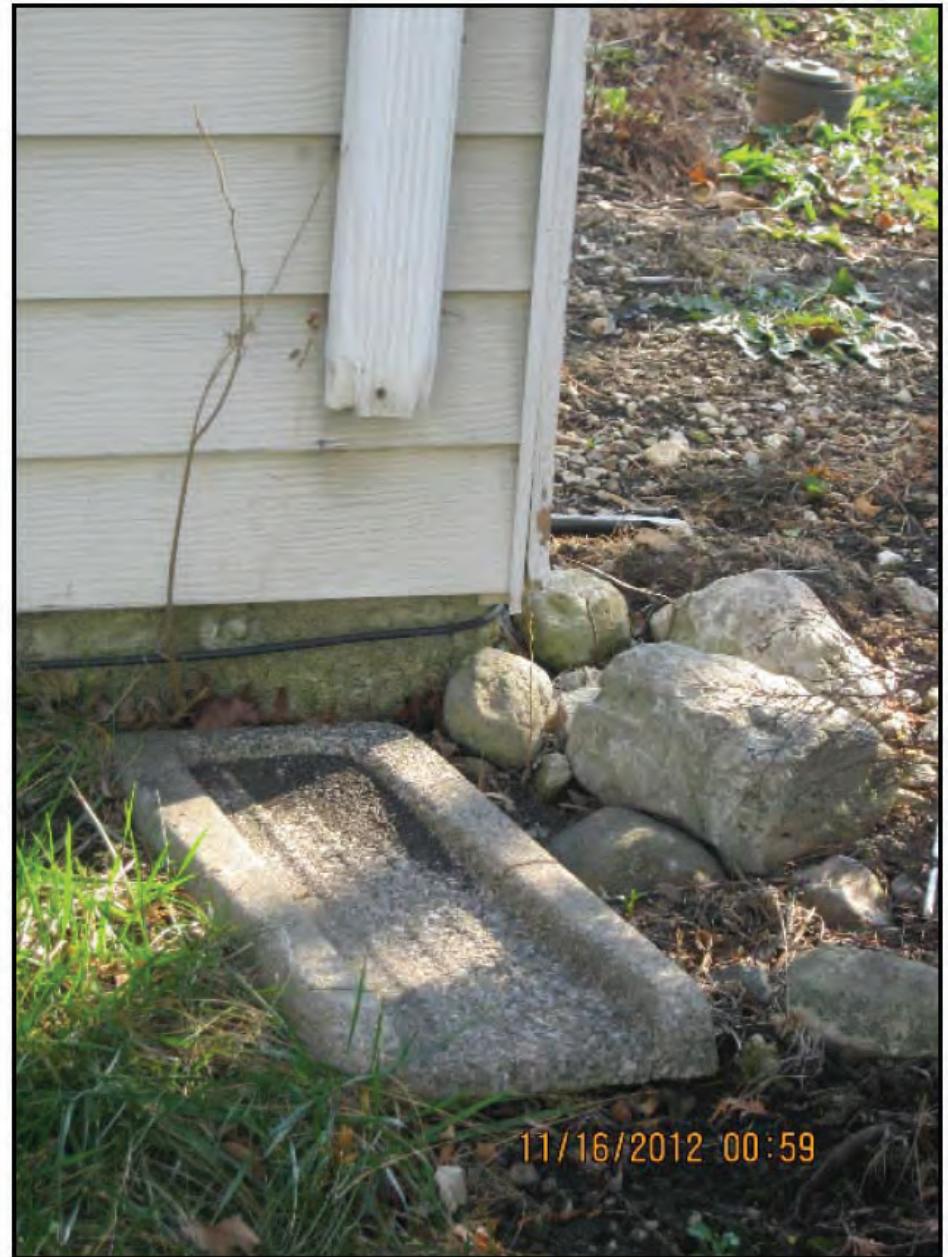
- Hanging or partially unattached shutters and shutters that are missing entirely when it appears that shutters were originally part of the structure



Gutters

- Missing/out of place
- Broken/Hanging
- Obstructed

Missing/Out of Place



Broken/Hanging Gutters

- Broken or hanging gutters damaged to the point where they no longer serve their function



Obstructed Gutters



- Obstructed gutters are clearly blocked with leaves or debris that is preventing the proper drainage of water

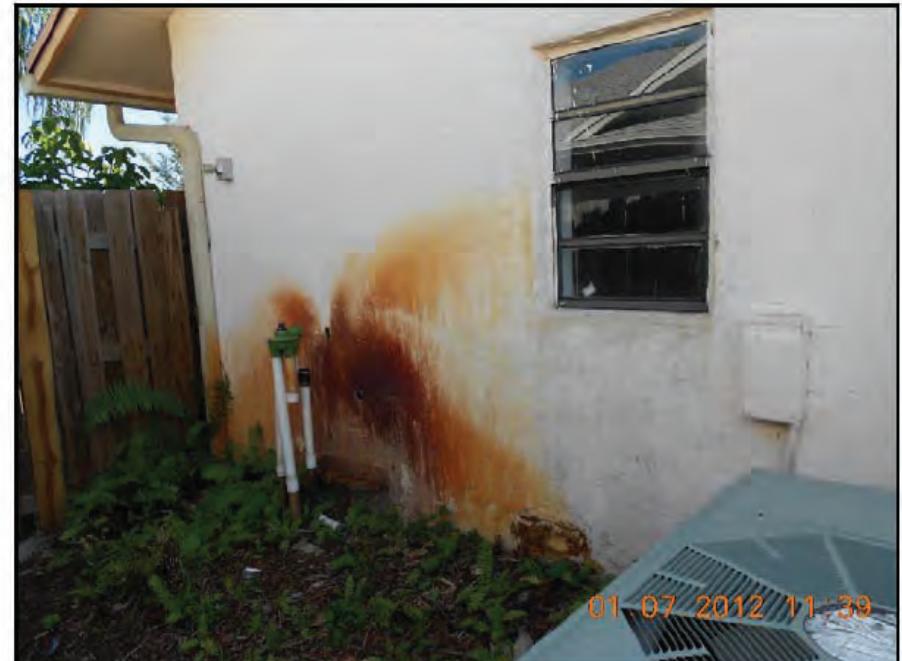
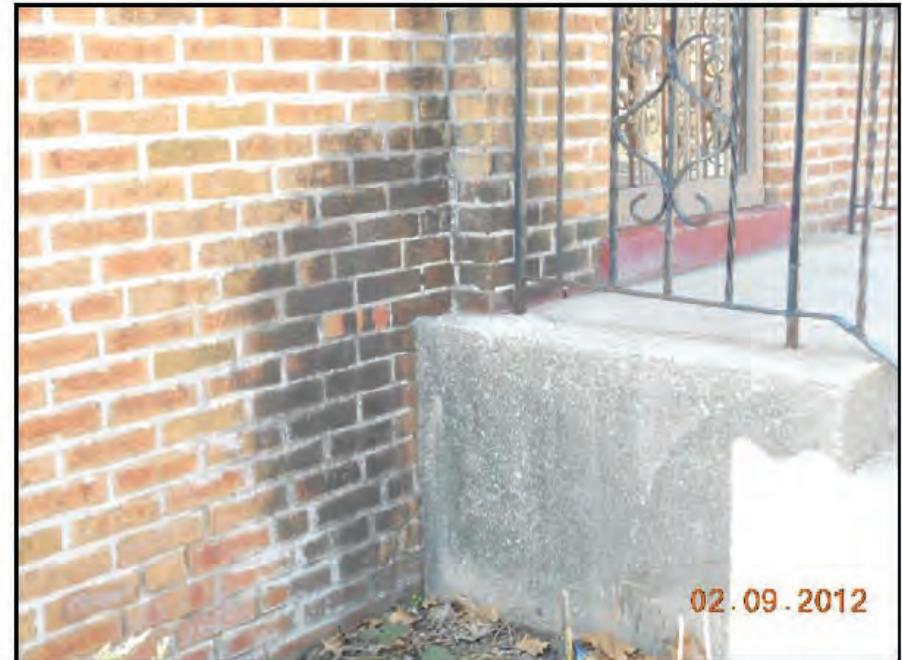


Water Damage

- Water Damage
- Mold

Water Damage

- Any demonstrated damage caused by water leaks or rainwater
- Water damage is evident from dark spots, rust, and/or standing water, puddles, and wet spots on the built areas of the property



Mold



- The presence of mold is characterized by green or brown fungal growth on the property
- This is often found on siding, at the foundation of the building, etc.

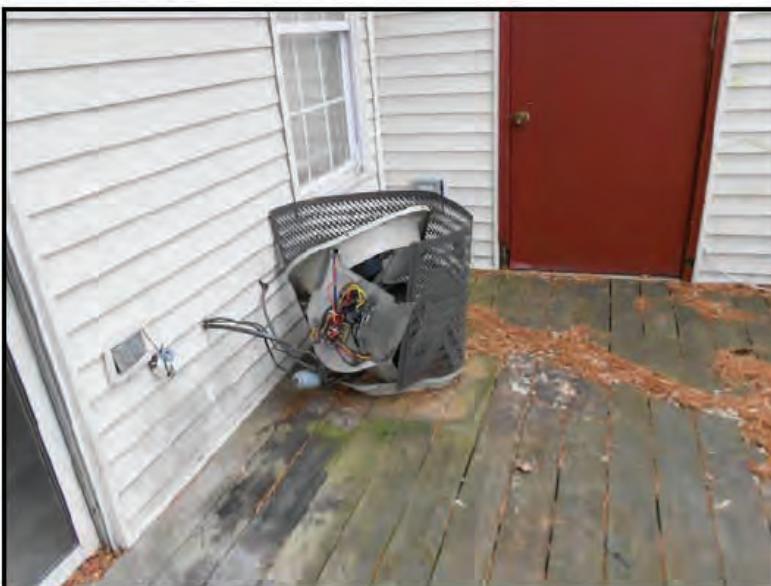
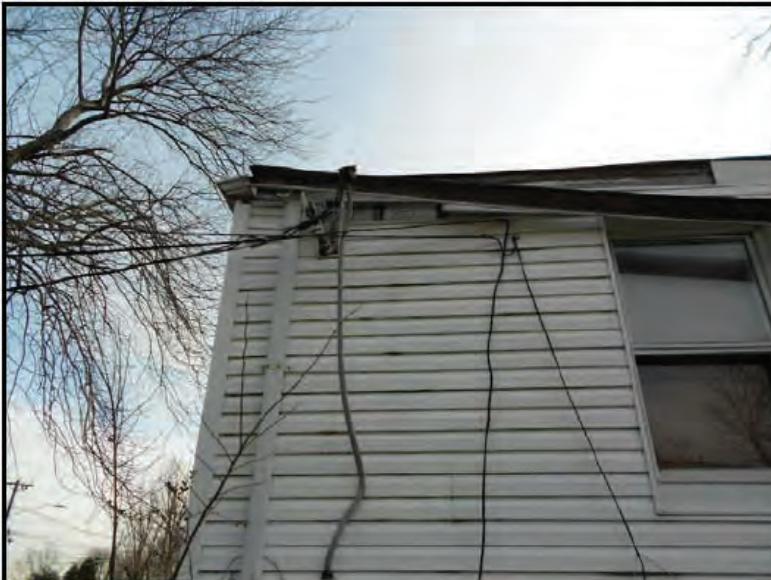


Utilities

- Exposed or tampered with
- Gas turned on or off?
- Meter turned on or off?

Exposed or Tampered with Utilities

- Including broken utility boxes and hanging or exposed wires



EXAMPLE #1

- 3600 Mt Olney Ln, Olney, MD
- Predominately White Neighborhood
- Score: 94 (A)

Picture 1 – Address



3600

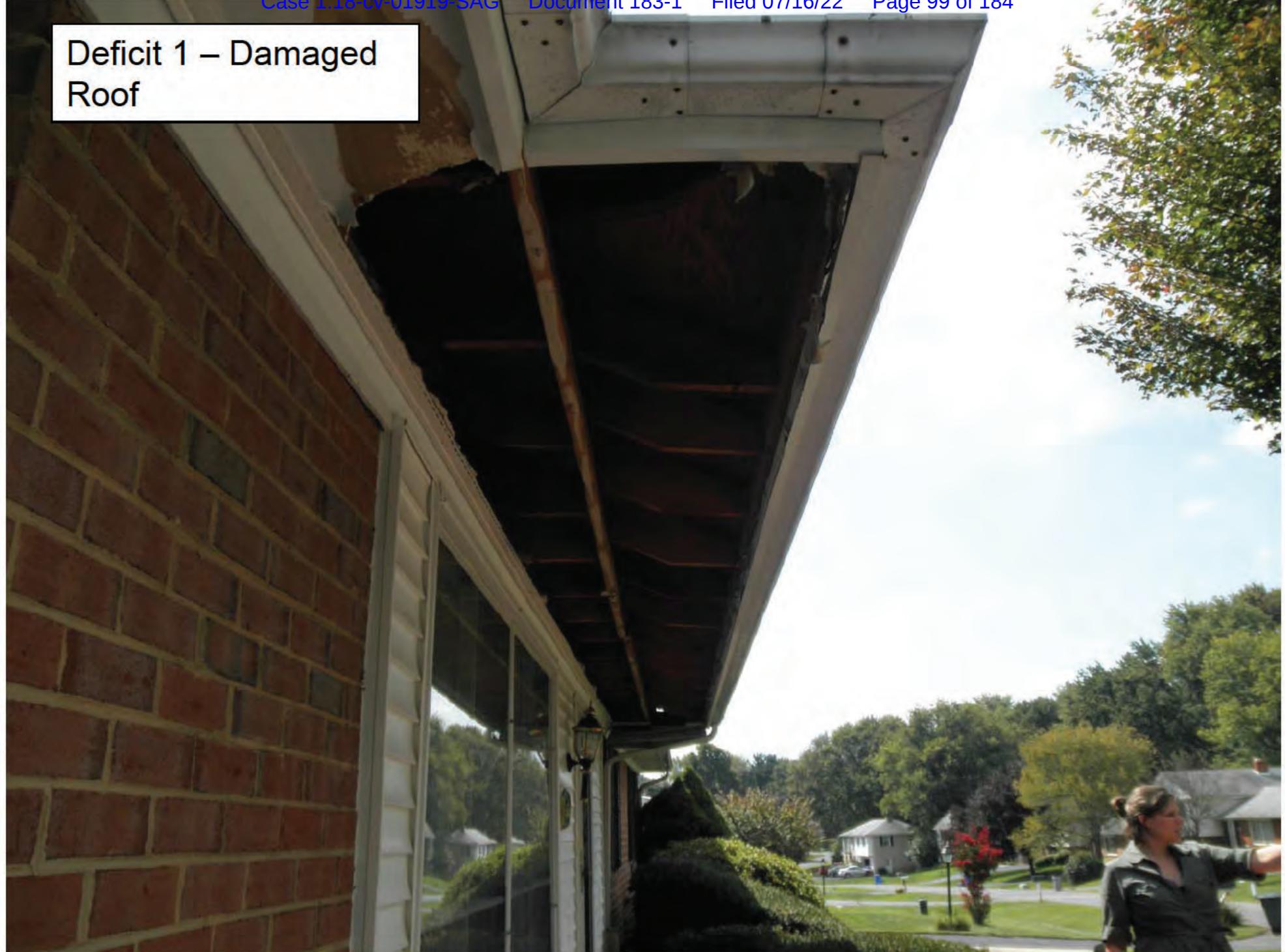
Picture 2 – Front view







Deficit 1 – Damaged Roof





Side View of Property



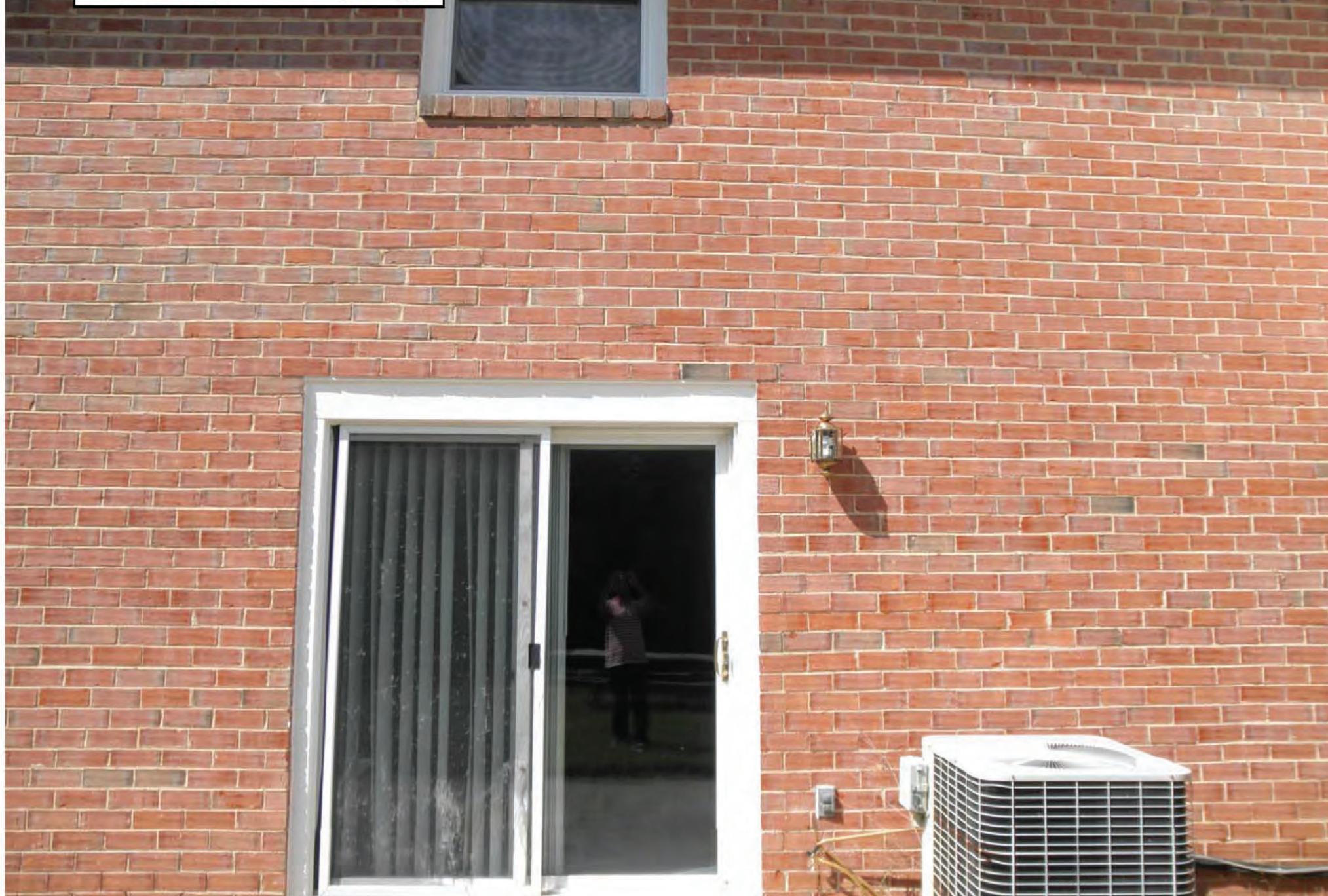
Back View of Property



Deficit 2 – Damaged Siding



Side view of Property



Neighbor on Right



Neighbor on Left



EXAMPLE # 2

- 309 Clara St, Oakland, CA
- Primarily African-American Neighborhood
- Score: 74





14/10/2011 12:46





14/10/2011 12:47





14/10/2011 12:46





14/10/2011 12:49







Washington DC, SE – Predominantly African American Neighborhood

Score: 44 (F)



Washington DC SE – 44 (F)





SE Washington DC – Predominately African American

Score: 46 (F)



Pasadena, MD – Predominately White Neighborhood

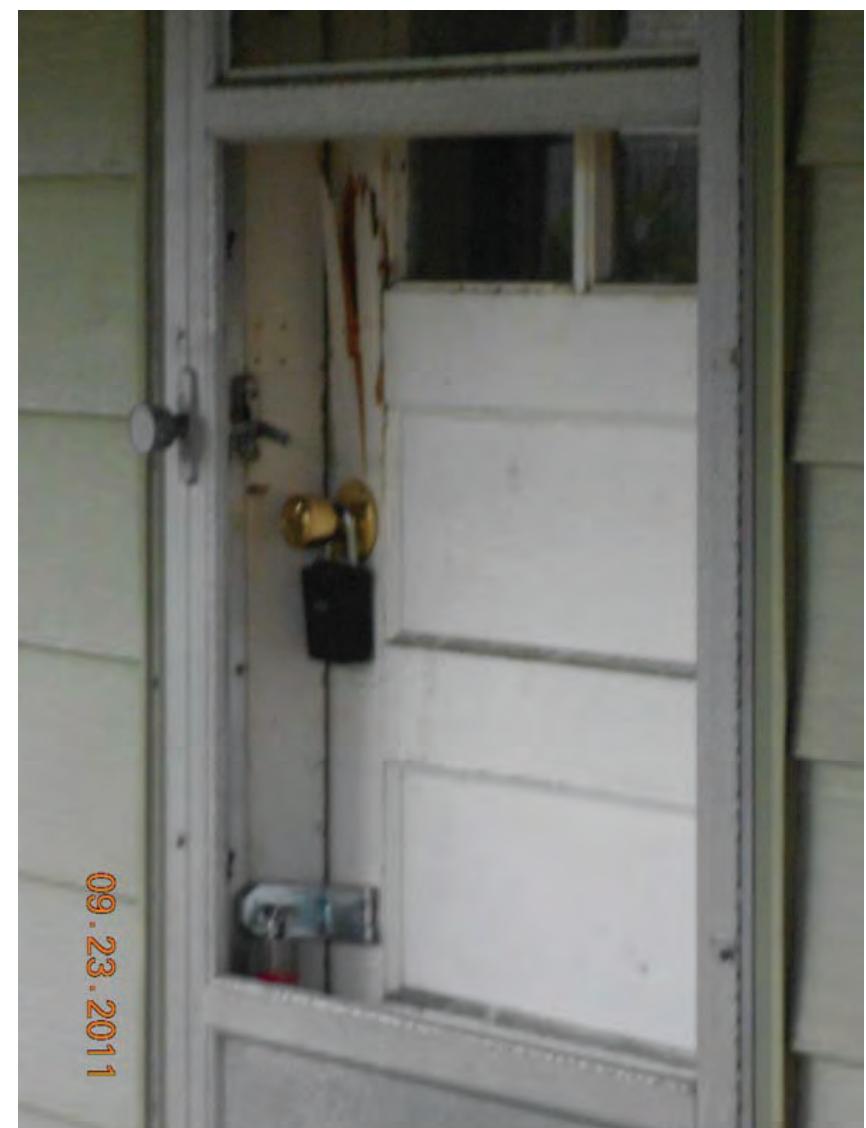
Score: 83 (B)

ALL ANGLES, ALL HOUSES



Gwynn Oak, MD – African American Neighborhood

Score: 54 (F)





Gwynn Oak, MD – **Don't Forget
Neighboring properties**



PART 4:

Recording Scores & Uploading to the Database



NFHA
National Fair Housing Alliance

Evaluation Form with Points

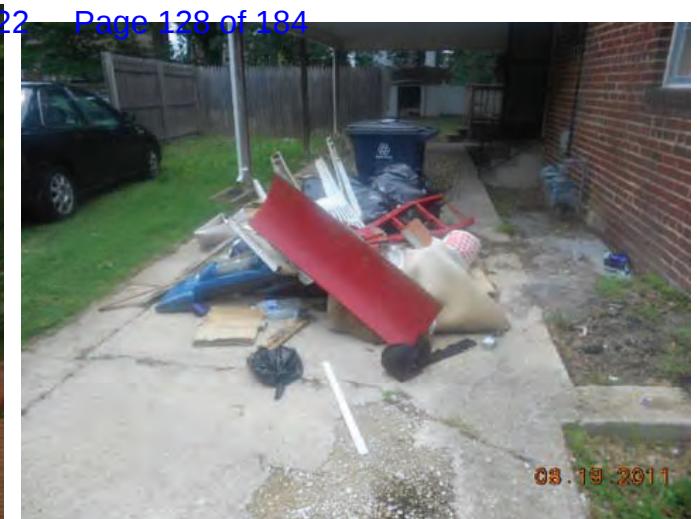
- S:\General Folder\REO
Investigation\Evaluation Forms\FINAL
Eval Form with Points Nov2012.xls

Online REO Maintenance Database

- <http://www.mvfairhousing.org/mvhc>
- You will receive a login and password from David Lauri
- Every picture and note should be recorded
- Vacant properties should be entered by not marked as scored – no photographs or notes needed

Neighbor Surveys

- Sent to neighbors directly next to and opposite of property (if occupied)
- Paired with a pre-stamped envelope addressed to NFHA
- REO Neighbor Survey



Temple Hills, MD
Predominantly African American Neighborhood
Score: 65 (D)



"The property has trash piled up in the driveway. After numerous calls the property is now being maintained with the grass being cut. We would appreciate the piles of trash removed."



Washington DC, SE – Predominantly African American Neighborhood

Score: 74 (C)

Neighbors have reported:

- ✓ Calling the police
- ✓ Calling the HoA
- ✓ Picking up trash
- ✓ Mowing the lawn
- ✓ Raking leaves
- ✓ Shoveling snow
- ✓ Securing windows
- ✓ Children playing on property
- ✓ “property has been vandalized many times”
- ✓ “Youngsters hanging out in the house”
- ✓ Increase in homeowners insurance
- ✓ “property is an eye sore”

“This issue has been ongoing for several years... After many complaints, some work was done to the property last year via a property preservation group hired by Bank of America. The Property was in such significant disrepair that HAZMAT suites were necessary to clean out the interior of propane tanks, dead animals, and stacks of newspapers and empty beer cans. Since the initial clean up, nothing has been done to maintain the property and is it worsening by the day. The front porch ceiling has now completely caved in, rodents remain a major issue, the windows are busted out, and the yard is atrocious. It is a nightmare to live next to and is gravely affecting our neighborhood and property values.”

Jennifer Wilcox, Atlanta, GA

EXHIBIT B



REO Investigation Photo Protocols

Minimum photographs that every home must have:

- Address
- Front view with for sale sign visible
- Separate photo of for sale sign
- Neighbor(s) to right
- Neighbor(s) to left
- Neighbor(s) across the street
- Up the street view
- Down the street view
- Side view - left and right—from front and back of REO
- Back of home –from back door to end of yard & end of yard to back of REO
- Backyard of home
- Photo for **each** deficit
- Legible photos of all signage—close up photo(s)
- Date stamps on photo

Photo tips and reminders:

- You may need to take multiple front view photos to get a good view of the home including the for sale sign.
- Take a right and left side view from the front of the home and also the back of the home for different perspectives / angles.
- We need photos that show perspective—so take close-up pictures of signage, deficits, etc – and then step back and take a photo so we have perspective—for example—on the size of the hole or the unsecured open door.
- If there are multiple instances of a deficit, photo every deficit—so if there are three broken or boarded window—there should be a photo of each one.
- If you cannot access the back of the home:
 - Take a photo of the locked gate/fence
 - Reach over the fence with your camera and take a few photos. Look at the photos right away to make sure you have a decent photo.
 - Write in the database notes: "Could not access backyard"
- Take photographs of items on the evaluation form such as maintained lawns / shrubs, well-maintained gutters and downspouts, and utilities, etc

EXHIBIT C



Guidelines to using the REO Investigation Database

Logging in to the REO database

1. Type www.mvfairhousing.org/mvfhc in to your browser – you will be directed to a login screen.
2. Log in using your username and password, which should have been sent to you by David Lauri or Jason Collins from the Miami Valley Fair Housing Center.
3. You will then see a welcome screen, which has a menu of links on the left hand side. Click on “Rescue Partnership”.

Creating a new REO property record

1. On the left hand side of the screen, you will now have a new menu appear under the “Rescue Partnership Link”
2. Click the first link labeled “New”.
3. You will be sent to a new screen which allows you to create a new record for a new REO property. Type in the Street address, City, State, and Zipcode of the REO property you are entering.
4. Type in the Year built.
5. You do not need to do anything with the area that says “Neighborhood Racial Mix”
6. Enter the date that you visited the REO property next to “Date of visit”.
7. Enter the time that you visited the REO property if not stamped on the photographs.
8. Next to “Evaluator”, it will say your name if you are signed in to your own account. You also have the option of changing the evaluator to one of your colleagues ONLY if that person also has an account on the database.
9. Next to “Lender”, click “add”. You will now see a dropdown menu. Find the lender/owner of the property among the choices.
10. You do not need to add anything next to “Servicer” or “Asset Mgmt Provider”.
11. In the “Notes” field, type in the source of the REO property (if applicable) and any other relevant information to the property obtained during the REO investigation and site visit.
12. Hit “ENTER” to finalize the creation of your new property record.
13. You have now created a new record for your REO property. If you need to make any changes to the fields you have just entered, you must hit the “UPDATE” button to save those changes.

Attaching your photographs to the REO property record

1. To add a deficiency to the file of your REO property, click the button next to “Photo/Deficits” that says “NEW”.
2. You will now see a screen that allows you to attach a photo to your file. Click “Choose File” and find the photograph that you wish to upload.
3. For photographs of the front view of the property, click the checkbox next to “Main photo for property” so that this photograph appears as the thumbnail for this property record in property searches.
4. You do not need to enter anything next to “order”.
5. Now you are able to either enter a description or a deficit to be associated with this photograph.
6. To enter a deficit associated with the photograph, click the drop down menu next to “Deficit” and select the subcategory under which that deficit falls. For example, if you are entering a photograph of a broken window, you would first select “Structure” and a second drop down menu would be generated that would allow you to then select “Damaged Windows (Broken or Boarded)”.
7. If you do not have a deficit associated with the photograph, you MUST enter a description. For example, if you are uploading a photograph of the neighboring property to the left, you would type “Neighboring property to the left” under description and leave the field next to “Deficit” blank.
8. Click “Enter”
9. You will now be sent back to the main page for this property, and the photograph (and associated deficit, if applicable) will be stored under this property record.
10. Do not enter the same deficit more than 1 time –for example, if you have take 4 separate photographs of trash on a premises, only enter it as a deficit one time. For the additional photographs of trash, upload them with the description “Additional trash” or “Trash (2)” without using the drop down menu. **Using the drop down menu and assigning a deficit to a property more than once will result in the property receiving an artificially low score.**
11. Continue adding deficits until your score, or “Ranking” under the deficit summary is correct. Make sure that the final score on the database matches the score found at the bottom of your field evaluation form.
12. Be sure to upload all the photographs you have taken at the property, including those not associated with a particular deficit, including but not limited to:
 - a. Address
 - b. Front view of property
 - c. Neighboring properties
 - d. Examples of good maintenance
 - e. Back view, side views etc. that do not show maintenance deficiencies
 - f. Signage

General Tips:

- We also ask that you create an entry for each property that you visit that is occupied, being worked on, or otherwise "unscoreable." Make sure for occupied properties you check the box labeled "Not to be evaluated" when you create a record for the property. **Failing to do this will result in the property receiving a score of 100, which misrepresents what occurred during your site visit.**
- If you are investigating a lender whose name does not appear in the drop down menu, send a request via email to Lindsay Augustine at laugustine@nationalfairhousing.org and it can be added in for you.

EXHIBIT D

ID	Street	City	State	Race	Bates No. of Handwritten Survey Tool	Handwritten Note (brackets indicate which deficiency category note was next to on form)	Captured in Database Description?	Captured in Database Photo?	How Was Note Preserved?	Supporting Photograph(s)
4049	34 Croydon Drive	Bloomfield	CT	Majority Non-White	CFHC 000044	[Mail] ?No	No	Yes	Comment "?no" indicated that there was not accumulated mail. Photo shows one phone book.	PLAINTIFFS 26200
						Garage door	Yes	Yes	REO Database has that comment: "garage door damage"; photo shows garage door.	PLAINTIFFS 26209
						Survey sent	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
						In DB	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
11575	167 Pembroke Avenue	Waterbury	CT	Majority Non-White	CFHC 000026	No gutters	N/A	N/A	Comment is irrelevant because absence of gutters on entire home was not an item scored in the investigation.	N/A
						Broken siding, bad driveway	No	Yes	Photos show damaged siding and worn concrete.	PLAINTIFFS 60060, 60453
						Add pictures, complete	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
11580	179 Greenwood Avenue	Waterbury	CT	Majority Non-White	CFHC 000028	Side door broken / broken lock	No	Yes	Photo shows broken padlock on door.	PLAINTIFFS 60073
						Add photos, complete	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
4050	13 Crestview Drive	Bloomfield	CT	African American	CFHC000007	[Overgrown grass](recently cut but still long)	No	Yes	Photos shows long grass with long cut grass laying on top of it. REO Database comment says "over grown grass".	PLAINTIFFS 69288, 69285, 69291
						[Structure] (broken patio deck)	Yes	Yes	Comment in REO Database captures this note: "covering under deck is damaged". Photo shows damaged deck skirting.	PLAINTIFFS 69290
						[Peeling paint] (patio deck)	Yes	Yes	Comment in REO Database captures this note: "peeling paint or stain on back deck." Photo shows deck with chipped paint.	PLAINTIFFS 69293
						(damaged shutters) damaged	Yes	Yes	Comments in REO Database capture this note: "broken shutter" and "another broken shutter". Photos show damaged shutters.	PLAINTIFFS 69299, 69301, 69298
						Survey sent	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
						In DB	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
13657	142 Chestnut Avenue	Waterbury	CT	Majority Non-White	CFHC000015	New owner: Jacks	N/A	N/A	Comment is irrelevant to investigation	N/A
						[Mailbox] Missing	N/A	N/A	Comment is irrelevant to investigation because absence of a mailbox was not an item scored in the investigation.	N/A
						Burnt house - everything is damaged.	No	Yes	Multiple photos show fire damage to home and porch.	PLAINTIFFS 65465, 65467, 65472, 65475, 65483, 65495, 65498, 65500
						No signage at all.	No	Yes	Photos show lack of signage besides "No Trespassing" sign.	PLAINTIFFS 65465, 65466

ID	Street	City	State	Race	Bates No. of Handwritten Survey Tool	Handwritten Note (brackets indicate which deficiency category note was next to on form)	Captured in Database Description?	Captured in Database Photo?	How Was Note Preserved?	Supporting Photograph(s)
13643	16 Cottage Grove Circle	Bloomfield	CT	White	CFHC000021	[Trash] Minimal in yard No mail box Driveway cracked w/ weeds Construction trash Broken door, broken ramp to door [Windows] Incomplete Moss on roof [Holes] Siding Out building: broken door, moss on roof [For Sale Sign] Missing Vacancy posting [Siding] Discolored and dented Downspout in incorrect position, driveway [Mold] On siding	No N/A No Yes No No Yes No Yes Yes No Yes No Yes No No No No	Yes N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes	Photos show trash in yard. Comment is irrelevant to investigation because absence of a mailbox was not an item scored in the investigation. Photos show cracked driveway with weeds growing out of the cracks. REO Database has that comment: "construction trash". Photo shows construction trash. Photo shows ramp to broken out-structure door. Photo shows broken plastic window cover. REO Database has that comment: "moss on roof" and "moss on roof of shed". Photo shows moss on roof of home and shed. Photos show holes in siding. Photo shows out building with broken door and moss on roof. Photo of front of home shows absence of "for sale" sign marketing the home. REO Database has that comment: "Vacancy posting". REO Database has photo of vacancy posting signage. Photos show discolored and dented siding. Photos show downspout by driveway, but because they do not show any incorrect positioning, no gutter/downspout deficiency was marked in database. Photo shows mold on siding.	PLAINTIFFS 65281, 65282, 65296, 65288 N/A PLAINTIFFS 65278 PLAINTIFFS 65288 PLAINTIFFS 65286 PLAINTIFFS 65296 PLAINTIFFS 65290, 65287 PLAINTIFFS 65295, 65290 PLAINTIFFS 65287 PLAINTIFFS 65275 PLAINTIFFS 65277 PLAINTIFFS 65279, 65280 PLAINTIFFS 65279, 65280 PLAINTIFFS 65289
13651	11 Beatrice Drive	West Haven	CT	White	CFHC00003	[Structure] Air conditioner wrap is disheveled Retaining wall fell (3.5 cinder blocks) Dog pen has overgrown grass	No No No	Yes Yes Yes	Photo shows air conditioner with disheveled wrap. Photo shows retaining wall with fallen cinder blocks. Photo shows dog pen with overgrown weeds.	PLAINTIFFS 65387 PLAINTIFFS 65395 PLAINTIFFS 65392
11653	34 Decicco Road	Waterbury	CT	White	CFHC000046	Cracked driveway Windows have been taped up [Structure] Cracked masonry / foundation Broken outdoor light [Mold] Around garage	No No No Yes No	Yes Yes Yes Yes Yes	Photo shows cracked driveway. Photo shows taped window. Photo shows cracked foundation. Photo shows broken outdoor light. REO Database has comment "broken lights". Photos show pervasive mold on siding around the garage.	PLAINTIFFS 60408 PLAINTIFFS 60414 PLAINTIFFS 60401 PLAINTIFFS 60404 PLAINTIFFS 60403, 60407
11709	162 Sprucedale Drive	Waterbury	CT	White	CFHC 000024	[Trash] in backyard, construction trash Cracked sidewalk [Overgrown grass] On side lawn Chipped paint on door Cracked paint, rust on railing Back steps - no paint, worn wood Smushed garage door Insecure back deck [Peeling paint] on windowsills [Damaged siding] in back Downspout [Mold] On siding Done, complete	No No No No No No No No No No N/A	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes N/A	Photos show trash in backyard, including construction debris. Photos show cracked sidewalk. Photo shows overgrown grass on side lawn. Photo shows chipped paint on front door. Photo shows cracked paint; rust on handrails alone would not be marked as deficiency. Photo shows unfinished deck in backyard with no paint and worn wood. Photo shows front of home with dented garage. Photo shows unfinished deck in back of home. Photo shows peeling paint on windowsills. Photo shows minimal damaged siding in back of house. Photo shows missing downspout. Photos show mold on the siding of the home. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60562, 60558 PLAINTIFFS 60547, 60563 PLAINTIFFS 60563 PLAINTIFFS 60548 PLAINTIFFS 60552 PLAINTIFFS 60558 PLAINTIFFS 60546 PLAINTIFFS 60558 PLAINTIFFS 60552 PLAINTIFFS 60561 PLAINTIFFS 60555 PLAINTIFFS 60553, 60554, 60555, 60556 N/A

ID	Street	City	State	Race	Bates No. of Handwritten Survey Tool	Handwritten Note (brackets indicate which deficiency category note was next to on form)	Captured in Database Description?	Captured in Database Photo?	How Was Note Preserved?	Supporting Photograph(s)
11778	38 Colley Street	Waterbury	CT	Majority Non-White	CFHC000052	[Door] Pad locked Shopping cart in yard Construction trash Boarded window Broken masonry Exposed wood New shingles - not painted Exposed wood, chipped wood Gutters in disrepair Boarded back door + pad lock Broken screen [Paint and Siding] Not painted new [Gutters] Moldy Garbage in backyard Complete	No No No Yes No No No No No No No No No N/A	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes N/A	Photo shows padlocked door. Photo shows shopping cart in yard. Photo shows trash on the property. REO Database has that comment: "boarded window." Photos show boarded windows. Photo shows broken masonry. Photo shows exposed wood. Photos show new shingles that are not painted. Photos show exposed wood and chipped wood. Front photo shows home's gutters, but because they do not show disrepair, no gutter deficiency was marked in database. Photo shows boarded back door window and padlock on door. Photo shows broken screen. Photos show siding that is not painted. Front photo shows home's gutters, but because they do not appear moldy; no gutter deficiency was marked in database. Photo shows garbage in backyard. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 12124 PLAINTIFFS 12114 PLAINTIFFS 12122 PLAINTIFFS 12124, 12121 PLAINTIFFS 12116 PLAINTIFFS 12120 PLAINTIFFS 12117, 12119, 12120 PLAINTIFFS 12120 PLAINTIFFS 12115 PLAINTIFFS 12111 PLAINTIFFS 12124 PLAINTIFFS 12125 PLAINTIFFS 12111, 12117, 12119, 12120 PLAINTIFFS 12111 PLAINTIFFS 12122 N/A
11897	38 South Street	Waterbury	CT	Latino	CFHC000054	Construction + regular trash Steps	No No	Yes Yes	Photo shows construction debris and trash in neighboring yard. Trash deficiency was removed pursuant to quality control. Photo shows steps in back of home near out structure.	PLAINTIFFS 61182 PLAINTIFFS 61169
13649	139 Butler Street	New Haven	CT	African American	CFHC000017	"Mice are in house" - Neighbor No grass [Door] Pad lock, open back door [Fence] Completed mangled [Structure] Wires all over the side Meters are missing	N/A Yes No No No	N/A Yes Yes Yes Yes	Comment is irrelevant because comments from neighbors were not items scored in the investigation. Photo shows backyard which is covered in dirt, with no grass. REO Database has that comment: "no grass in back yeard". Photos show pad locked door, open back door, and unsecured shed. REO Database has comment: "damaged siding/unsecured back door." Photos show damaged fence and damaged window fencing. Photos show wires hanging on side of home. Photo shows damaged utilities and missing meter.	N/A PLAINTIFFS 65326 PLAINTIFFS 65325, 65327, 65331 PLAINTIFFS 65333, 65320 PLAINTIFFS 65319, 65314 PLAINTIFFS 65314
4825	39 Prospect Street	East Hartford	CT	Majority Non-White	CFHC000058	Filled pool w/ green water [Invasive plants] Into siding at garage [Door] Screen Broken garage door	No No Yes Yes	Yes Yes Yes Yes	Photo shows filled pool with green water. Photo shows invasive plants growing out of siding on garage Photo shows broken screen door. REO Database has comment: "screen door broken". Photo shows broken garage door. REO Database has that comment: "broken garage doors".	PLAINTIFFS 28537 PLAINTIFFS 28536 PLAINTIFFS 71485 PLAINTIFFS 71488
11578	40 Gail Drive	Waterbury	CT	Majority Non-White	CFHC000060	Construction trash Cracked pavement Chipped paint on siding and door frame Missing light fixture Side door no screen / pad lock on side door Add pictures Complete	No No No Yes No N/A	Yes Yes Yes Yes Yes N/A N/A	Photos show trash and construction debris. Photo shows cracked pavement. Photos show chipped paint on siding and around door frame and window frame. Photo shows missing light fixture. REO Database has that comment: "missing light fixture". Photos show side door with no screen, and padlock on side door. Comment is irrelevant to investigation - was internal note for database uploader. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60066, 60475 PLAINTIFFS 60470 PLAINTIFFS 60472, 60473 PLAINTIFFS 60070 PLAINTIFFS 60067, 60473 N/A N/A

ID	Street	City	State	Race	Bates No. of Handwritten Survey Tool	Handwritten Note (brackets indicate which deficiency category note was next to on form)	Captured in Database Description?	Captured in Database Photo?	How Was Note Preserved?	Supporting Photograph(s)
11588	439 Stillson Road	Waterbury	CT	White	CFHC 000064	[Structure] Peeling paint, mold on siding Add photos Complete	No N/A N/A	Yes N/A N/A	Photos show peeling paint and mold on the home's siding. Comment is irrelevant to investigation - was internal note for database uploader. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60082, 60083, 60539 N/A N/A
4824	445 Tolland Street	East Hartford	CT	Majority Non-White	CFHC000066	[Trash] Front + back [Dead grass] small amount [Steps] front entrance [Window] front [Roof] back [Wood rot] Deck on back	No No Yes Yes No Yes	Yes	Photos do not show any trash in front or back, but do show accumulated mail in front and back. Accumulated mail was marked as a deficiency in database, while trash was not. Appears evaluators marked "Y" next to trash (and placed this note next to it), when they meant to place "Y" and note in the accumulated mail deficiency immediately below "trash." Photo shows dead grass. Photo shows steps at front entrance. REO Database has comment: "steps damaged at front entrance". Photo shows broken and boarded front window. REO Database has comment: "front windows broken and boarded". Photo shows damaged roof in back. Photo shows wood rot on deck in back. REO Database has that comment: "on back deck".	PLAINTIFFS 28557, 28558 PLAINTIFFS 28526 PLAINTIFFS 28527 PLAINTIFFS 28528 PLAINTIFFS 28529 PLAINTIFFS 28531
11655	45 Ellsmere Avenue	Waterbury	CT	White	CFHC000068	Driveway in disrepair, construction Missing backdoor frame (sliding door) Loose wire out of doorbell [Steps] Broken cement, chipped paint, rust on rail Bare wood on back deck [Peeling paint] Retaining wall, front steps, on pipe, garage windowsill, on back deck [Mold] Siding Missing pipe Complete Done	No No No No No No No N/A N/A	No Yes Yes Yes Yes Yes Yes N/A N/A	There is no photo of the driveway to confirm or deny this comment. No deficiency was marked for this property given the lack of photographic evidence. Photos show missing and damaged sliding door doorframe. Photo shows loose wires hanging out of doorbell. Photo shows damaged steps with broken cement, chipped paint, and rust on the rail. Photo shows damaged siding and bare wood on back deck. Photos show peeling paint on retaining wall, front steps, and on the back deck. Photo shows mold on siding. Photo shows hole where missing pipe is located. Comment is irrelevant to investigation - was internal note for database uploader. Comment is irrelevant to investigation - was internal note for database uploader.	N/A PLAINTIFFS 60427, 60426 PLAINTIFFS 60419 PLAINTIFFS 60420 PLAINTIFFS 60424 PLAINTIFFS 60420, 60425, 60424, 60417 PLAINTIFFS 60428 PLAINTIFFS 60422 N/A N/A
13654	38 Wright Avenue	New Haven	CT	African American	CFHC000056	Leaves, trash, driveway cracked + filled with leaves and trash. Back deck is rotted [Door] Pad lock [Roof] Moss + lifting shingles [Siding] Mold	No No No No No	Yes Yes Yes Yes Yes	Photos show leaves and trash in driveway, and cracked driveway. Photos show back deck. Photo shows backyard shed with padlock. Photos show moss in gutters and lifting siding. REO Database has comment: "Moss". Photo shows mold on siding.	PLAINTIFFS 65436, 65450 PLAINTIFFS 65453, 65456 PLAINTIFFS 65457 PLAINTIFFS 65437, 65459 PLAINTIFFS 65445

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13650	47 Shelton Avenue	New Haven	CT	African American	CFHC000072	[Trash] In yard Broken front door Woodrot - walkway steps cracked Unfinished board - windows Rotting tree in backyard [Trespassing or warning signs] "Enter at your own risk" Foreclosure sign "Hanging/loose wires"	No No No No No No No	Yes Yes Yes Yes Yes Yes Yes	Multiple photos show trash in yard. Photo shows splintered wood near keyhole. Photos show wood rot and cracked driveway. Photos show unfinished boards above windows. Photo shows fallen tree at edge of backyard property line. Photo shows door with "Enter at your own risk!" written in marker. Photo shows foreclosure sign on deck. Photos show loose and hanging wires.	PLAINTIFFS 65349, 65342, 65358, 65363, 65364, 65365, 65367, 65371 PLAINTIFFS 65348 PLAINTIFFS 65352, 65351 PLAINTIFFS 65360, 65365 PLAINTIFFS 65364 PLAINTIFFS 65366 PLAINTIFFS 65346 PLAINTIFFS 65354, 65376
11586	54 Altyre Street	Waterbury	CT	White	CFHC000078	Boarded back door + window / missing garage door window Walkway / back stairs rotted [Window] Boarded up basement / broken glass Mold on siding Add photos Complete	No No No No N/A N/A	Yes Yes Yes Yes N/A N/A	Photos show boarded back door, boarded window, and missing garage door window. Photo shows back stairs with rotted and damaged wood. Photo shows boarded basement door with glass on ground. Photos show mold on siding. Comment is irrelevant to investigation - was internal note for database uploader. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60076, 60075, 60526 PLAINTIFFS 60521 PLAINTIFFS 60075 PLAINTIFFS 60077, 60520 N/A N/A
13658	562 Congress Avenue	Waterbury	CT	White	CFHC000082	[Trash] Mostly in back Missing light sconces Missing awning but holes are in the side of the building [Door] peeling paint [Steps] No railing, cracked cement on side [Window] Broken [Roof] Wood rot on eaves [Wood rot] Under front door Rot around the eaves of the entire house	No No No No No No No No No	Yes Yes Yes Yes Yes Yes Yes Yes	Photos show trash in back of home. Photo shows front of home with missing sconces. Photo shows missing awning and holes in the side of the home. Photos show peeling paint on doors. Photo shows front steps with no railing and cracked cement. Photos show broken windows. Photo shows wood rot on eaves. Photo shows rotting wood under door. Multiple photos show rot around the home's eaves.	PLAINTIFFS 65543, 65533 PLAINTIFFS 65512 PLAINTIFFS 65552 PLAINTIFFS 65533, 65509 PLAINTIFFS 65514, 65517, 65516 PLAINTIFFS 65511, 65510 PLAINTIFFS 65519 PLAINTIFFS 65515 PLAINTIFFS 65548, 65541, 65542, 65519, 65518, 65549, 65550
11652	57 Celia Drive	Waterbury	CT	White	CFHC000084	Freshly cut lawn Wooden shack in back Rusty front rail Construction trash in back [Peeling paint] On foundation [Mold] On the siding & gutters Old oil tank in backyard, window screen out Complete	Yes No No No No No No N/A	Yes Yes Yes Yes Yes Yes Yes N/A	Photo shows recently mowed grass. Comment in REO Database captures this note: "freshly cut grass". Photos show wooden shack in back. Photo shows front of house with rusty handrails. Photo shows oil tank in backyard and window screen leaning against siding. Photo shows peeling paint on foundation. Photos show mold on siding and gutters. Photo shows oil tank in backyard and window screen leaning against siding. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60386 PLAINTIFFS 60386, 60387 PLAINTIFFS 60382 PLAINTIFFS 60389 PLAINTIFFS 60384 PLAINTIFFS 60390, 60391, 60388 PLAINTIFFS 60389 N/A
11576	57 Dan Parker Drive	Waterbury	CT	White	CFHC000086	Screen door / front door in disrepair (no screen) Add pictures Complete	Yes N/A N/A	yes N/A N/A	Photo shows screen door in disrepair with no screen. Comment in REO Database captures this note: "broken screen doors; doors broken". Comment is irrelevant to investigation - was internal note for database uploader. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60065 N/A N/A

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13629	706 Nott Street	Wethersfield	CT	White	CFH000088	[Overgrown grass or leaves] Backyard No mailbox 3 garage doors are boarded 5 open windows to basement 1 broken side window - boarded Weird chain link fence in front of driveway Missing front step [Trespassing or warning signs] In front [Unauthorized Occupancy] Front + side doors [Gutters] 100% missing	No N/A Yes Yes Yes No Yes No No N/A	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes	Photo shows overgrown grass in backyard. Comment is irrelevant to investigation because absence of a mailbox was not an item scored in the investigation. Front photo shows lack of mailbox. Photo shows 3 boarded garage doors. Comment in REO Database captures this note: "boarded doors to garage which lead to house". Photos show 5 open basement windows. REO Database has this comment: "5 open windows into basement" and "open basement window". Photo shows broken and boarded side door. Comment in REO Database captures this note: "boarded window in the back". Photo shows chain link fence in front of driveway. Photo shows missing front step. Comment in REO Database captures this note: "missing steps to door". Photo shows trespassing sign. Photos show front and side doors, but because there is no evidence of unauthorized occupancy, this deficiency was not marked in database. Comment is irrelevant because absence of gutters on entire home was not an item scored in the investigation. Front photo of home shows absence of gutters.	PLAINTIFFS 65238 PLAINTIFFS 65231 PLAINTIFFS 65239 PLAINTIFFS 65241, 65242, 65243, 65245 PLAINTIFFS 65244 PLAINTIFFS 65234 PLAINTIFFS 65245 PLAINTIFFS 65235 PLAINTIFFS 65236, 65239, 65245 PLAINTIFFS 65231
11627	73 Woodbine Street	Waterbury	CT	White	CFHC000090	[Window] Side window [Roof] Broken gutters [Holes] In steps (front steps) Broken gutters Gas meter pulled Complete	No Yes No Yes No N/A	Yes Yes Yes Yes Yes N/A	Photos show broken side windows. Photos show broken and hanging gutters. Comment in REO Database captures this note: "hanging gutter". Photos show damaged front steps. Photos show broken and hanging gutters. Comment in REO Database captures this note: "hanging gutter". Photo shows gas meter pulled. Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60109, 60110, 60111 PLAINTIFFS 60114, 60113 PLAINTIFFS 60104, 60107 PLAINTIFFS 60114, 60113 PLAINTIFFS 60115 N/A
11625	773 Frost Road	Waterbury	CT	Majority Non-White	CFHC000092	Leaves built up Broken glass in back Garage door has a lock [Windows] Boarded in back Siding coming off Gutters not clean & broken Complete	No No N/A Yes No No N/A	Yes No N/A Yes Yes Yes N/A	Photos show built up and accumulated dead leaves. Photos do not show broken glass in back, but trash deficiency was already marked for this property and supported by other photographs. Comment is irrelevant to investigation because presence or absence of lock on a garage was not a deficiency (only if door was damaged or unsecured). Photos show windows boarded in back of house. Comment in REO Database captures that note: "view of all boarded windows--back of house". Photo of siding shows chipped paint on siding, rather than siding coming off, so peeling/chipped paint deficiency was marked in database. Photo shows obstructed gutters. No photo evidence of a broken gutter. Obstructed gutter (not broken gutter) is marked as a deficiency in database Comment is irrelevant to investigation - was internal note for database uploader.	PLAINTIFFS 60103, 60090 N/A N/A PLAINTIFFS 60094, 60093, 60092, 60091 PLAINTIFFS 60096 PLAINTIFFS 60097 N/A

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13652	89 Eileen Road	West Haven	CT	Majority Non-White	CFHC000100	One plant Overgrown grass in one area where construction trash is. [Window] One basement window Window box structure failing Deck + board are old [Peeling paint] just around door(s) framing.	No No No No No No	Yes Yes Yes Yes Yes Yes	Photo shows overgrown plant growing on back side of home. Photo shows overgrown grass and construction debris. Photo shows broken basement window. Photo shows window box structure that is failing and sagging. Photo shows deck with old boards. Photos show peeling paint around door frames.	PLAINTIFFS 65415 PLAINTIFFS 65420 PLAINTIFFS 65412 PLAINTIFFS 65417 PLAINTIFFS 65418 PLAINTIFFS 20206, 65402, 65410
13636	97 Risley Street	East Hartford	CT	Majority Non-White	CFHC000102	Construction trash Accumulated leaves Unfinished railing Roof needs repair [Roof] Shingles in repair Old chain link fence Unauthorized vehicle Railings are unpainted	No No No No No No No No	Yes Yes Yes Yes Yes Yes Yes Yes	Photo shows construction debris in yard. Photo shows accumulated leaves. Photo shows temporary wooden railing. Photos show damaged roof that needs repairing. Photo shows damaged roof with shingles that need repairing. Photo of front of home shows old chain link fence. Photo shows unauthorized truck parked in driveway. REO Database has comment: "car in driveway". Photo shows unpainted temporary wooden railing.	PLAINTIFFS 65267 PLAINTIFFS 65259 PLAINTIFFS 65264 PLAINTIFFS 65266, 65269 PLAINTIFFS 65266, 65269 PLAINTIFFS 65254 PLAINTIFFS 65263 PLAINTIFFS 65264
2552	10010 Lansdowne Drive	Dallas	TX	Latino	NTFHC000036	843 left 844 right	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A
2539	1007 Ann Arbor Avenue	Dallas	TX	African American	NTFHC000038	House burned door slot burned	Yes Yes	Yes Yes	Multiple photos show fire damage. REO Database has comments: "roof damaged by fire", "mail slot in front door burned by fire", "front door burned by fire", "fire damage inside house". Photo shows door slot that is burned. REO Database captures that note: "mail slot in front door burned by fire."	PLAINTIFFS 66726, 66719, 66715, 66713, 66716, 66722, 66718, 66720 PLAINTIFFS 66716
10940	6700 Waterhill Lane	Fort Worth	TX	Majority Non-White	NTFHC0000164	Boarded water feature A/C tampered	Yes Yes	Yes Yes	Photo shows boarded water feature. REO Database has that comment: "boarded water feature". Photo shows A/C unit with wires tampered with. REO Database has comment: "A/C unit tampered with."	PLAINTIFFS 58265 PLAINTIFFS 8678
4434	1617 Algonquin Dr.	Dallas	TX	Majority Non-White	NTFHC000056	[Mailbox] Missing Cracked driveway Cracked wall Light post by front of house exposed electrical	N/A Yes Yes Yes	N/A Yes Yes Yes	Comment is irrelevant to investigation because absence of a mailbox was not an item scored in the investigation. Photo shows cracked driveway. REO Database has that comment: "cracked driveway". Photo shows cracked wall. REO Database has that comment: "cracked wall". Photo shows light post by front of house with exposed electrical. REO Database has that comment: "2nd utility photo: light post by front of house - all electrical exposed".	N/A PLAINTIFFS 69978 PLAINTIFFS 69986 PLAINTIFFS 69991
10936	7004 Jewell Avenue	Fort Worth	TX	Majority Non-White	NTFHC0000162	Broken glass blocking access to backyard	Yes	Yes	Photo shows broken glass blocking access to backyard. REO Database captures this note: "broken glass".	PLAINTIFFS 58247
2604	31 Grant Circle	Richardson	TX	White	NTFHC000068	[Gutter] Elbow joint missing	Yes	Yes	Photo shows gutter with missing elbow joint. REO Database has that comment: "elbow joint missing from gutter".	PLAINTIFFS 67019
10938	1609 Miller Avenue	Fort Worth	TX	Latino	NTFHC000134	Boarded garage	Yes	Yes	Photo shows boarded garage. REO Database has this comment: "boarded garage".	PLAINTIFFS 8650
4745	2725 Ryan Place Dr.	Fort Worth	TX	Latino	NTFHC000066	Cracked driveway [scratched out] [Steps] Back house [scratched out] Brick pulling away window	No N/A Yes	Yes N/A Yes	Photo shows front of home with cracked driveway. Not preserved since crossed out and no deficiency marked on form. Photo shows brick pulling away the window. REO Database has that comment: "brick pulling away from window".	PLAINTIFFS 28073 N/A PLAINTIFFS 28090
2537	3203 Ledbetter Drive	Dallas	TX	African American	NTFHC000074	[Steps] ramp	Yes	Yes	Photo shows damaged ramp. REO Database has that comment: "damaged ramp".	PLAINTIFFS 66701

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4218	3211 Delafield Lane	Dallas	TX	Majority Non-White	NTFHC000078	Driveway cracked	Yes	Yes	Photo shows cracked driveway. REO Database has that comment: "driveway cracked".	PLAINTIFFS 69507
						[Wood rot] (illegible) no photo but, scored [scratched out]	No	Yes	Photo shows wood rot.	PLAINTIFFS 69504
						No gutters [scratched out]	N/A	N/A	Comment is irrelevant because absence of gutters on entire home was not an item scored in the investigation and comment is crossed out.	N/A
4704	3123 NW. 25th St.	Fort Worth	TX	Latino	NTFHC000070	Dogs	N/A	N/A	Comment is irrelevant because presence of dogs would not be marked as deficiency.	N/A
4220	3615 Rising Sun Ln.	Dallas	TX	African American	NTFHC000082	Wasp nests at top of front door	No	No	There is no photo of the wasp nests to confirm or deny this comment. No deficiency was marked for this property given the lack of photographic evidence.	N/A
						Crack along brick + slab of house	Yes	Yes	Photo shows crack along brick and slab of house. REO Database has that comment: "crack along the brick and slab of house".	PLAINTIFFS 26515
						No gutters [scratched out]	N/A	N/A	Comment is irrelevant because absence of gutters on entire home was not an item scored in the investigation.	N/A
4219	3622 Apple Valley Way	Dallas	TX	African American	NTFHC000084	Looked like glue put in cracks of brick	No	Yes	Photo shows crack in brick. Comment about glue is irrelevant because presence of glue would not be marked as a deficiency.	PLAINTIFFS 69513
						No gutters [scratched out]	N/A	N/A	Comment is irrelevant because absence of gutters on entire home was not an item scored in the investigation and comment is crossed out.	N/A
4744	3201 Lakeland St.	Fort Worth	TX	Latino	NTFHC000073	Foundation house on cracking	Yes	Yes	Photo shows the crumbling foundation on which the house is on. REO Database captures this comment: "Foundation house on crumbling".	PLAINTIFFS 70661
4705	4104 Tiburon St.	Fort Worth	TX	Latino	NTFHC000086	Tons of wasp nests [scratched out]	N/A	N/A	Not preserved since crossed out and no deficiency marked on form.	N/A
2603	5935 Prospect Avenue	Dallas	TX	White	NTFHC000089	[Gutter] No elbow joint	Yes	Yes	Photos show gutters with missing elbow joint. REO Database has that comment: "elbow joint missing from gutter" and "another gutter with missing elbow joint".	PLAINTIFFS 67008, 67009
4526	6603 Marla Dr.	Dallas	TX	African American	NTFHC000096	Cracked driveway	Yes	Yes	Photo shows cracked driveway. REO Database has that comment: "Cracked driveway".	PLAINTIFFS 27597
						Cracked driveway [scratched out]	Yes	Yes	Photo shows cracked driveway. REO Database has that comment: "Cracked driveway".	PLAINTIFFS 27597
						[Siding] Looks like styrofoam	No	Yes	Photos show damaged siding on home.	PLAINTIFFS 27604, 27603, 27614
11697	5549 Eisenhower Drive	Fort Worth	TX	African American	NTFHC0000142	Broken light fixture	Yes	Yes	Photo shows broken light fixture. REO Database has that comment: "broken light fixture".	PLAINTIFFS 60484
2606	800 Woodland Way	Richardson	TX	White	NTFHC0000102	[Holes] Chimney	Yes	Yes	Photo shows hole in chimney. REO Database has comment: "cover to chimney broken".	PLAINTIFFS 67054
						[Structure] Pool	Yes	Yes	Photo shows uncovered pool full of dirty water. REO Database has that comment: "dirty pool".	PLAINTIFFS 67048
						Chimney [scratched out]	No	Yes	Photo shows hole in chimney. REO Database has comment: "cover to chimney broken".	PLAINTIFFS 67054
						[Siding] Brick	Yes	Yes	Photo shows loose brick. REO Database has comment: "lose brick".	PLAINTIFFS 67050
10942	8344 Everglades Circle	Fort Worth	TX	White	NTFHC0000144	[Door] Broken handle	Yes	Yes	Photo shows broken door handle. REO Database has this comment: "broken front door handle".	PLAINTIFFS 58281
4226	9110 Tampas Lane	Dallas	TX	Latino	NTFHC000112	[Mailbox] Took after LRA pics	N/A	N/A	Comment is irrelevant to investigation - was internal note for database uploader.	N/A

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4414	9621 Dale Glade Dr.	Dallas	TX	Latino	NTFHC000116	[Mailbox] Missing from house by door	Yes	Yes	Comment is irrelevant to investigation because absence of a mailbox was not an item scored in the investigation. REO Database has photo and comment: "mailbox missing screws in brick".	PLAINTIFFS 69909
						[Door] Gate on front door screen in lock	Yes	Yes	Photo shows the gate on the front door. REO Database has that comment: "gate on front door had screw in lock and wouldn't shut".	PLAINTIFFS 69910
						[Shutters] Broken	Yes	Yes	Photo shows broken shutters. REO Database has that comment: "broken shutters".	PLAINTIFFS 69916

EXHIBIT E

File Name: Bank of America Property List with Deficiencies 2.10.22

Original File Size: 305,674 Bytes

EXHIBIT F

Investigation Findings

Plaintiffs investigated 1,405 REO properties owned or maintained by Defendants in the following metropolitan areas: (1) Atlanta, GA.; (2) Baltimore, MD; (3) Baton Rouge, LA; (4) Birmingham, AL; (5) Chicago, IL; (6) Cleveland, OH; (7) Columbus, OH; (8) Dallas, TX; (9) Dayton, OH; (10) Denver, CO; (11) Suburban Detroit, MI; (12) Fort Worth, TX; (13) Gary, IN; (14) Grand Rapids, MI; (15) Greater Palm Beaches, FL; (16) Hartford, CT; (17) Indianapolis, IN; (18) Kansas City, MO/KS; (19) Louisville, KY; (20) Memphis, TN; (21) Miami / Fort Lauderdale, FL; (22) Milwaukee, WI; (23) Minneapolis, MN; (24) Muskegon, MI (25) New Haven, CT; (26) New Orleans, LA; (27) Newark, NJ; (28) Orlando, FL; (29) Philadelphia, PA; (30) Providence, RI; (31) Richmond and Oakland, CA; (32) San Antonio, TX; (33) Tampa, FL; (34) Toledo, OH; (35) Vallejo, CA; (36) Washington, DC and Prince George's County, MD; and (37) Waterbury, CT.

NATIONAL ANALYSIS

Across the 37 metropolitan areas where Plaintiffs evaluated REO properties owned or maintained by Defendants, Plaintiffs investigated 1,405 Bank of America REO properties. Of these 1,405 REO properties, 611 were located in African-American neighborhoods, 177 were located in predominantly Latino neighborhoods, 168 were located in predominantly non-White neighborhoods, and 449 were located in predominantly White neighborhoods.

- 39.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 7.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 92.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 61.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 46.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 10.7% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 9.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 1.3% of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Plaintiffs found racial disparities in all but two of the objective factors they measured:

- 64.6% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 30.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 24.8% of the REO properties in neighborhoods of color had accumulated mail, while only 18.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 54.3% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 39.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 35.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 18.6% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 13.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 9.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 3.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.8% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 21.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.2% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 6.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 9.1% of the REO properties in neighborhoods of color had a broken mailbox, while only 5.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had miscellaneous curb appeal deficiencies, while only 16.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 37.6% of the REO properties in neighborhoods of color had unsecured or broken doors and locks, while only 15.8% of the REO properties in predominantly White neighborhoods had the same problem.

- 22.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 13.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 50.6% of the REO properties in neighborhoods of color had broken or boarded windows, while only 23.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.8% of the REO properties in neighborhoods of color had a damaged roof, while only 9.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 42.5% of the REO properties in neighborhoods of color had a damaged fence, while only 26.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 31.6% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.9% of the REO properties in neighborhoods of color had wood rot, while only 16.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 31.8% of the REO properties in neighborhoods of color had miscellaneous structure deficiencies, while only 22.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.9% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 20.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 10.4% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while only 9.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 79.4% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 70.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 3.7% of the REO properties in neighborhoods of color had broken or discarded signage, while only 3.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 3.2% of the REO properties in neighborhoods of color had signs of unauthorized occupancy on the property, while only 0.4% of the REO properties in predominantly White neighborhoods had the same problem.

- 8.6% of the REO properties in neighborhoods of color had graffiti, while only 1.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 56.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 39.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.9% of the REO properties in neighborhoods of color had damaged siding, while only 23.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 3.5% of the REO properties in neighborhoods of color had missing or damaged shutters, while only 3.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 3.8% of the REO properties in neighborhoods of color had miscellaneous paint and siding deficiencies, while only 2.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 25.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 16.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 8.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 19.2% of the REO properties in neighborhoods of color had obstructed gutters, while only 18.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 9.7% of the REO properties in neighborhoods of color had water damage, while only 2.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.4% of the REO properties in neighborhoods of color had a small amount of mold, while only 20.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 9.2% of the REO properties in neighborhoods of color had pervasive mold, while only 6.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 29.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 8.7% of the REO properties in predominantly White neighborhoods had the same problem.

The only two types of deficiencies that were observed more frequently in predominantly White neighborhoods were:

- Miscellaneous gutter deficiencies: 1.3% of the REO properties in neighborhoods of color had miscellaneous gutter deficiencies and 2.4% of the REO properties in predominantly White neighborhoods had the same problem.
- Miscellaneous water damage deficiencies: 0.5% of the REO properties in neighborhoods of color had miscellaneous water damage deficiencies, and 1.6% of the REO properties in predominantly White neighborhoods had the same problem.

1. ATLANTA, GEORGIA

In the Atlanta, GA metropolitan area, Plaintiffs investigated 74 Bank of America REO properties. Of these 74 REO properties, 61 were located in African-American neighborhoods, 5 were located in predominantly non-White neighborhoods, and 8 were located in predominantly White neighborhoods.

- 37.5% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 3.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 97.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 62.5% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 54.5% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 10.6% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

2. BALTIMORE, MARYLAND

In the Baltimore, MD metropolitan area, Plaintiffs investigated 55 Bank of America REO properties. Of these 55 REO properties, 37 were located in African-American neighborhoods, 1 was located in a predominantly non-White neighborhood, and 17 were located in predominantly White neighborhoods.

- 35.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.5% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 89.5% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 64.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 34.2% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 5.9% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

3. BATON ROUGE, LOUISIANA

In the Baton Rouge, LA metropolitan area, Plaintiffs investigated 29 Bank of America REO properties. Of these 29 REO properties, 15 were located in African-American neighborhoods and 14 were located in predominantly White neighborhoods.

- 14.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 85.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 53.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 14.3% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 13.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

4. BIRMINGHAM, ALABAMA

In the Birmingham, AL metropolitan area, Plaintiffs investigated 28 Bank of America REO properties. Of these 28 REO properties, 20 were located in African-American neighborhoods and 8 were located in predominantly White neighborhoods.

- 100.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 95.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.

- 60.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 15.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

5. CHICAGO, ILLINOIS

In the Chicago, IL metropolitan area, Plaintiffs investigated 76 Bank of America REO properties. Of these 76 REO properties, 34 were located in African-American neighborhoods, 11 were located in predominantly Latino neighborhoods, 10 were located in predominantly non-White neighborhoods, and 21 were located in predominantly White neighborhoods.

- 47.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 9.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 90.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 52.4% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 49.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 4.8% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 9.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

6. CLEVELAND, OHIO

In the Cleveland, OH metropolitan area, Plaintiffs investigated 23 Bank of America REO properties. Of these 23 REO properties, 14 were located in African-American neighborhoods, 1 was located in a predominantly non-White neighborhood, and 8 were located in predominantly White neighborhoods.

- 25.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 75.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 60.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 25.0% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 13.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

7. COLUMBUS, OHIO

In the Columbus, OH metropolitan area, Plaintiffs investigated 39 Bank of America REO properties. Of these 39 REO properties, 16 were located in African-American neighborhoods, 4 were located in predominantly non-White neighborhoods, and 19 were located in predominantly White neighborhoods.

- 36.8% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 95.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 63.2% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 70.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 40.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

8. DALLAS, TEXAS

In the Dallas, TX metropolitan area, Plaintiffs investigated 79 Bank of America REO properties. Of these 79 REO properties, 33 were located in African-American neighborhoods, 30 were located in predominantly Latino neighborhoods, 5 were located in predominantly non-White neighborhoods, and 11 were located in predominantly White neighborhoods.

- 27.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 8.8% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 91.2% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 72.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 44.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 18.2% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.4% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

9. DAYTON, OHIO

In the Dayton, OH metropolitan area, Plaintiffs investigated 33 Bank of America REO properties. Of these 33 REO properties, 17 were located in African-American neighborhoods and 16 were located in predominantly White neighborhoods.

- 64.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 18.8% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 5.9% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

10. DENVER, COLORADO

In the Denver, CO metropolitan area, Plaintiffs investigated 59 Bank of America REO properties. Of these 59 REO properties, 4 were located in African-American neighborhoods, 26 were located in predominantly Latino neighborhoods, 9 were located in predominantly non-White neighborhoods, and 20 were located in predominantly White neighborhoods.

- 35.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 2.6% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 97.4% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 65.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.

- 43.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 10.0% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 5.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

11. SUBURBAN DETROIT, MICHIGAN

In the Suburban Detroit, MI metropolitan area, Plaintiffs investigated 43 Bank of America REO properties. Of these 43 REO properties, 14 were located in African-American neighborhoods, 7 were located in predominantly non-White neighborhoods, and 22 were located in predominantly White neighborhoods.

- 40.9% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 59.1% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 42.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 4.5% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

12. FORT WORTH, TEXAS

In the Fort Worth, TX metropolitan area, Plaintiffs investigated 14 Bank of America REO properties. Of these 14 REO properties, 1 was located in an African-American neighborhood, 6 were located in predominantly Latino neighborhoods, 3 were located in predominantly non-White neighborhoods, and 4 were located in predominantly White neighborhoods.

- 100% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 90.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.

- 30.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

13. GARY, INDIANA

In the Gary, IN metropolitan area, Plaintiffs investigated 20 Bank of America REO properties. Of these 20 REO properties, 13 were located in African-American neighborhoods and 7 were located in predominantly White neighborhoods.

- 85.7% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 14.3% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 76.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 23.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

14. GRAND RAPIDS, MICHIGAN

In the Grand Rapids, MI metropolitan area, Plaintiffs investigated 91 Bank of America REO properties. Of these 91 REO properties, 21 were located in African-American neighborhoods, 16 were located in predominantly Latino neighborhoods, 11 were located in predominantly non-White neighborhoods, and 43 were located in predominantly White neighborhoods.

- 20.9% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 2.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 97.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 79.1% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 64.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 30.2% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

- 29.2% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 2.3% of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

15. GREATER PALM BEACHES, FLORIDA

In the Greater Palm Beaches, FL metropolitan area, Plaintiffs investigated 24 Bank of America REO properties. Of these 24 REO properties, 1 was located in an African-American neighborhood, 3 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-White neighborhoods, and 12 were located in predominantly White neighborhoods.

- 33.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 66.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 58.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 8.3% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

16. HARTFORD, CONNECTICUT

In the Hartford, CT metropolitan area, Plaintiffs investigated 12 Bank of America REO properties. Of these 12 REO properties, 1 was located in an African-American neighborhood, 2 were located in predominantly Latino neighborhoods, 4 were located in predominantly non-White neighborhoods, and 5 were located in predominantly White neighborhoods.

- 57.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

17. INDIANAPOLIS, INDIANA

In the Indianapolis, IN metropolitan area, Plaintiffs investigated 21 Bank of America REO properties. Of these 21 REO properties, 9 were located in African-American neighborhoods, 3 were located in predominantly non-White neighborhoods, and 9 were located in predominantly White neighborhoods.

- 44.4% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 55.6% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 58.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 8.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

18. KANSAS CITY, MISSOURI / KANSAS

In the Kansas City, MO/KS metropolitan area, Plaintiffs investigated 22 Bank of America REO properties. Of these 22 REO properties, 11 were located in African-American neighborhoods, 1 was located in a predominantly Latino neighborhood, 1 was located in a predominantly non-White neighborhood, and 9 were located in predominantly White neighborhoods.

- 55.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in White neighborhoods had fewer than 5 or more marketing or maintenance deficiencies.
- 100% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 44.4% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 33.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

19. LOUISVILLE, KENTUCKY

In the Louisville, KY metropolitan area, Plaintiffs investigated 23 Bank of America REO properties. Of these 31 REO properties, 6 were located in African-American neighborhoods and 17 were located in predominantly White neighborhoods.

- 29.4% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 70.6% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 33.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 5.9% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

20. MEMPHIS, TENNESSEE

In the Memphis, TN metropolitan area, Plaintiffs investigated 45 Bank of America REO properties. Of these 45 REO properties, 35 were located in African-American neighborhoods, 4 were located in predominantly non-White neighborhoods, and 6 were located in predominantly White neighborhoods.

- 66.7% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 48.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 16.7% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.7% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

21. MIAMI / FORT LAUDERDALE, FLORIDA

In the Miami and Fort Lauderdale, FL metropolitan area, Plaintiffs investigated 30 Bank of America REO properties. Of these 30 REO properties, 11 were located in African-American neighborhoods, 4 were located in predominantly Latino neighborhoods, 4 were located in predominantly non-White neighborhoods, and 11 were located in predominantly White neighborhoods.

- 45.5% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 94.7% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 54.5% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 47.4% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 9.1% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

22. MILWAUKEE, WISCONSIN

In the Milwaukee, WI metropolitan area, Plaintiffs investigated 122 Bank of America REO properties. Of these 122 REO properties, 68 were located in African-American neighborhoods, 21 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-White neighborhoods, and 25 were located in predominantly White neighborhoods.

- 84.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 21.6% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 78.4% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 16.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 9.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

23. MINNEAPOLIS, MINNESOTA

In the Minneapolis, MN metropolitan area, Plaintiffs investigated 16 Bank of America REO properties. Of these 16 REO properties, 2 were located in African-American neighborhoods, 5 were located in predominantly non-White neighborhoods, and 9 were located in predominantly White neighborhoods.

- 55.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 14.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 85.7% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 44.4% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 42.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 22.2% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

24. MUSKEGON, MICHIGAN

In the Muskegon, MI metropolitan area, Plaintiffs investigated 23 Bank of America REO properties. Of these 23 REO properties, 4 were located in African-American neighborhoods, 5 were located in predominantly non-White neighborhoods, and 14 were located in predominantly White neighborhoods.

- 28.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 88.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 71.4% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 7.1% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

25. NEW HAVEN, CONNECTICUT

In the New Haven, CT metropolitan area, Plaintiffs investigated 8 Bank of America REO properties. Of these 8 REO properties, 4 were located in African-American neighborhoods, 1 was located in a predominantly non-White neighborhood, and 3 were located in predominantly White neighborhoods.

- 33.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 66.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 60.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 16.7% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

26. NEW ORLEANS, LOUISIANA

In the New Orleans, LA metropolitan area, Plaintiffs investigated 28 Bank of America REO properties. Of these 28 REO properties, 14 were located in African-American neighborhoods, 4 were located in predominantly non-White neighborhoods, and 10 were located in predominantly White neighborhoods.

- 20.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 80.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 55.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

27. NEWARK, NEW JERSEY

In the Newark, NJ metropolitan area, Plaintiffs investigated 27 Bank of America REO properties. Of these 27 REO properties, 20 were located in African-American neighborhoods, 1 was located in a predominantly Latino neighborhood, 3 were located in predominantly non-White neighborhoods, and 3 were located in predominantly White neighborhoods.

- 66.7% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 4.2% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 95.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 50.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

28. ORLANDO, FLORIDA

In the Orlando, FL metropolitan area, Plaintiffs investigated 33 Bank of America REO properties. Of these 33 REO properties, 13 were located in African-American neighborhoods, 4 were located in predominantly Latino neighborhoods, 1 was located in a predominantly non-White neighborhood, and 15 were located in predominantly White neighborhoods.

- 13.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 86.7% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 83.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 40.0% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 27.8% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 20.0% of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

29. PHILADELPHIA, PENNSYLVANIA

In the Philadelphia, PA metropolitan area, Plaintiffs investigated 56 Bank of America REO properties. Of these 56 REO properties, 31 were located in African-American neighborhoods, 4 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-White neighborhoods, and 13 were located in predominantly White neighborhoods.

- 53.8% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 9.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 90.7% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 46.2% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 25.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 15.4% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

30. PROVIDENCE, RHODE ISLAND

In the Providence, RI metropolitan area, Plaintiffs investigated 11 Bank of America REO

properties. Of these 11 REO properties, 4 were located in predominantly Latino neighborhoods, 3 were located in predominantly non-White neighborhoods, and 4 were located in predominantly White neighborhoods.

- 50.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 85.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 25.0% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

31. RICHMOND AND OAKLAND, CALIFORNIA

In the Richmond and Oakland, CA metropolitan area, Plaintiffs investigated 56 Bank of America REO properties. Of these 56 REO properties, 8 were located in predominantly African-American neighborhoods, 22 were located in predominantly Latino neighborhoods, 12 were located in predominantly non-White neighborhoods, and 14 were located in predominantly White neighborhoods.

- 50.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 7.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 92.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 47.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 7.1% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 11.9% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

32. SAN ANTONIO, TEXAS

In the San Antonio, TX metropolitan area, Plaintiffs investigated 21 Bank of America REO properties. Of these 21 REO properties, 16 were located in predominantly Latino neighborhoods,

1 was located in a predominantly non-White neighborhood, and 4 were located in predominantly White neighborhoods.

- 50.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.8% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 88.2% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 41.2% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 11.8% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

33. TAMPA, FLORIDA

In the Tampa, FL metropolitan area, Plaintiffs investigated 38 Bank of America REO properties. Of these 38 REO properties, 11 were located in African-American neighborhoods, 5 were located in predominantly Latino neighborhoods, 17 were located in predominantly non-White neighborhoods, and 5 were located in predominantly White neighborhoods.

- 40.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 93.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 60.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 63.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 9.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

34. TOLEDO, OHIO

In the Toledo, OH metropolitan area, Plaintiffs investigated 35 Bank of America REO properties. Of these 35 REO properties, 8 were located in African-American neighborhoods, 2 were located in predominantly non-White neighborhoods, and 25 were located in predominantly White neighborhoods.

- 24.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 76.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 70.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 8.0% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 10.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

35. VALLEJO, CALIFORNIA

In the Vallejo, CA metropolitan area, Plaintiffs investigated 17 Bank of America REO properties. Of these 17 REO properties, 12 were located in predominantly non-White neighborhoods and 5 were located in predominantly White neighborhoods.

- 60.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 33.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 66.7% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 40.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 16.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 8.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

36. WASHINGTON, DC AND PRINCE GEORGE'S COUNTY, MD

In the Washington, DC and Prince George's County, MD metropolitan area, Plaintiffs investigated 58 Bank of America REO properties. Of these 58 REO properties, 54 were located in African-American neighborhoods and 4 were located in predominantly White neighborhoods.

- 75.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.6% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 94.4% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 25.0% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 66.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 14.8% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

37. WATERBURY, CONNECTICUT

In the Waterbury, CT metropolitan area, Plaintiffs investigated 16 Bank of America REO properties. Of these 17 REO properties, 1 was located in a predominantly Latino neighborhood, 6 were located in predominantly non-White neighborhoods, and 9 were located in predominantly White neighborhoods.

- 22.2% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 14.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 85.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 77.8% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 42.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 11.1% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.

EXHIBIT G

Safeguard Undisputed Properties – National Findings

Across the 37 metropolitan areas where Plaintiffs evaluated REO properties owned and maintained by Defendants, Plaintiffs investigated 778 Bank of America REO properties that Safeguard Properties LLC does not dispute servicing. Of these 778 REO properties, 334 were located in African-American neighborhoods, 94 were located in predominantly Latino neighborhoods, 99 were located in predominantly non-White neighborhoods, and 251 were located in predominantly White neighborhoods.

- 41.4% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 8.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 92.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 58.6% of the REO properties in White neighborhoods had 5 or more marketing or maintenance deficiencies.
- 43.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 8.4% of the REO properties in White neighborhoods had 10 or more marketing or maintenance deficiencies.
- 6.5% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 0.4% of the REO properties in White neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. For each of the deficiencies that Safeguard concedes are within industry standards,¹ Plaintiffs found significant racial disparities:

- 62.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 25.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.2% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 37.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.0% of the REO properties in neighborhoods of color had unsecured or broken doors and locks, while only 16.3% of the REO properties in predominantly White neighborhoods had the same problem.

¹ See Ex. 5 to Expert Report of Marcel A. Bryar (“Bryar Rep.”), ECF No. 171-3.

- 12.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 6.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 17.6% of the REO properties in neighborhoods of color had obstructed gutters, while only 15.9% of the REO properties in predominantly White neighborhoods had the same problem.

For each of the deficiencies that Safeguard concedes are sometimes within industry standards,² Plaintiffs also found significant racial disparities:

- 56.5% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 36.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 21.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.1% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 7.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 21.4% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 12.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 46.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 21.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 14.8% of the REO properties in neighborhoods of color had a damaged roof, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.5% of the REO properties in neighborhoods of color had a damaged fence, while only 24.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 11.2% of the REO properties in predominantly White neighborhoods had the same problem.

² See Ex. 5 to Bryar Rep., ECF No. 171-3 (deficiency categories marked with “maybe”).

- 27.5% of the REO properties in neighborhoods of color had wood rot, while only 10.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 6.8% of the REO properties in neighborhoods of color had graffiti, while only 1.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 34.7% of the REO properties in neighborhoods of color had damaged siding, while only 24.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 5.5% of the REO properties in neighborhoods of color had water damage, while only 1.2% of the REO properties in predominantly White neighborhoods had the same problem.

EXHIBIT H

Placeholder

File Name: Jacob Rugh - Bank of America REOs - Boarded Doors Windows

Original File Size: 120,324 Bytes

EXHIBIT I

Analysis Removing “For Sale” Sign Missing Deficiencies for Properties with FHA or VA Loans

	Community of Color (Full dataset)	White (Full dataset)	Community of Color - After FHA/VA “For Sale” Sign Deficiency Removed	White -After FHA/VA “For Sale” Sign Deficiency Removed
Less than 5 Deficiencies	7.1%	39.0%	8.8%	39.6%
5 or More Deficiencies	92.9%	61.0%	91.2%	60.4%
10 or More Deficiencies	46.9%	10.7%	45.5%	10.5%
15 or More Deficiencies	9.1%	1.3%	9.0%	1.3%

	Community of Color	White
Average Number of Deficiencies (Full dataset)	9.30	5.91
Average Number of Deficiencies After FHA/VA “For Sale” Sign Deficiency Removed	9.18	5.86

EXHIBIT J

Placeholder

File Name: 2021-06-29 Bank of America photo records

Original File Size: 6,605,263 Bytes

EXHIBIT K

